

**Exhibit F**

**Appendix of Exhibits to Amended Complaint**

**Vol. V of VI**

## TABLE OF CONTENTS

### Vol. V

<b>Exhibit 66</b> Caroline Kitchener, <i>Alone in a Bathroom: The Fear and Uncertainty of a Post-Roe Medication Abortion</i> (April 11, 2024) .....	App. 001026
<b>Exhibit 67</b> Plan C, Texas .....	App. 001055
<b>Exhibit 68</b> Pam Belluck, <i>Abortion Shield Laws: A New War Between the States</i> , New York Times (Feb. 22, 2024).....	App. 001074
<b>Exhibit 69</b> MAP, Frequently asked questions .....	App. 001087
<b>Exhibit 70</b> Abuzz .....	App. 001089
<b>Exhibit 71</b> Abuzz, FAQs.....	App. 001097
<b>Exhibit 71a</b> Abuzz, How it works.....	App. 001108
<b>Exhibit 72</b> Shira Stein, <i>Thousands of Out-of-State Abortion Seekers Rely on Two Dozen Doctors from Telehealth Shield States</i> , San Francisco Chronicle (June 12, 2024).....	App. 001114
<b>Exhibit 73</b> Armadillo Clinic .....	App. 001125
<b>Exhibit 74</b> We Take Care of Us FAQ .....	App. 001129
<b>Exhibit 74a</b> We Take Care of Us.....	App. 001142
<b>Exhibit 75</b> Plan C Missouri .....	App. 001147
<b>Exhibit 76</b> Plan C Idaho.....	App. 001166
<b>Exhibit 77</b> Plan C Kansas.....	App. 001184
<b>Exhibit 78</b> Plan C, Kansas Abortion Clinic Guide from Plan C Pills .....	App. 001202
<b>Exhibit 79</b> Hey Jane, About Us .....	App. 001208

**Exhibit 80** Plan C, Websites That Sell Pills ..... App. 001216

**Exhibit 81** Dominique Mosbergen and Vibhuti Agarwal, *Websites Selling Unapproved Abortion Pills Are Booming*, Wall Street Journal (Aug. 21, 2022) ..... App. 001225

**Exhibit 82** Declaration of Dr. Ingrid Skop..... App. 001232

## **EXHIBIT 66**

**Alone in a Bathroom – Washington Post**

# *Alone in a bathroom:*

## The fear and uncertainty of a post-Roe medication abortion

By Caroline Kitchener

April 11, 2024 at 6:00 a.m.

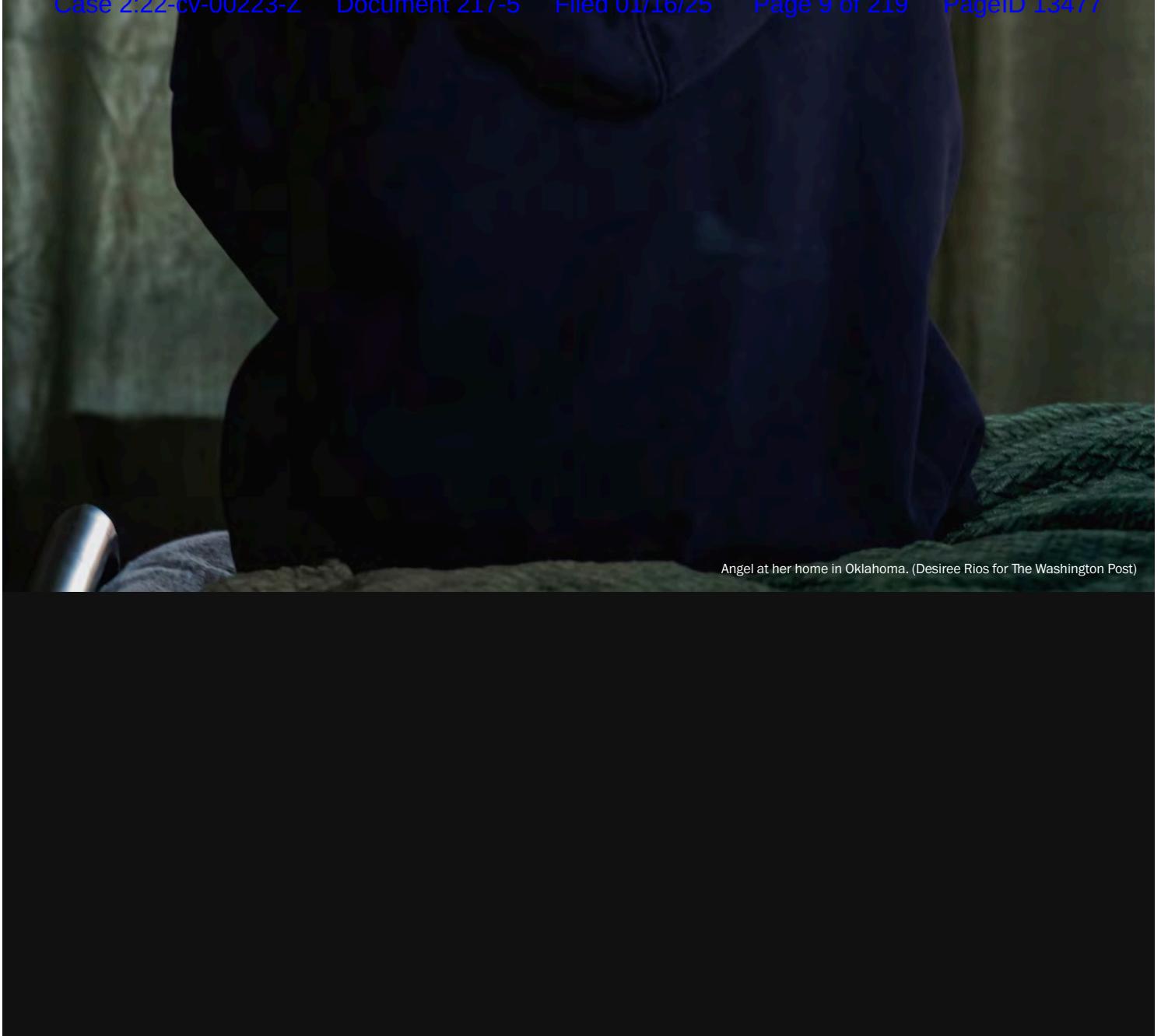
Share  Comment  Save

SCROLL TO CONTINUE 

**Angel tucked two white pills into each side of her mouth, bracing herself as they began to dissolve.**







Angel at her home in Oklahoma. (Desiree Rios for The Washington Post)

Angel had wanted to talk to a doctor before she took the pills to end her pregnancy, worried about how they might interact with medication she took for her heart condition.

But in her home state of Oklahoma, where almost all abortions are banned, that wasn't an option.

The pain kicked in after about an hour, around midnight on a Sunday in January, eventually becoming sharp enough that the 23-year-old said she struggled to stand. While Angel would be fine by the next morning, she worried that something might be very wrong as she lay on the cold bathroom tile, her body racked by some of the worst pain she could remember.

App. 001031

When Angel's fiance came in to check on her, she was having diarrhea while vomiting into their popcorn bowl.

"F---" she remembered yelling, over and over. "I feel like I need to push."

Overwhelming evidence shows that abortion pills are safe and effective, and that many patients who take them go through the process without much difficulty, experiencing little more than the sharp cramping and bleeding of an unusually heavy period. That is true even when the pills, approved by the U.S. Food and Drug Administration with a prescription for use through 10 weeks of pregnancy, are taken somewhat independently — administered by a doctor over text, email, or a call and mailed to the patient at home.

But the experience can feel very different in states where abortion is illegal. As more women in states with abortion bans choose to end their pregnancies on their own, without directly interacting with a medical professional, they are thrust into a largely ad hoc, unregulated system of online and grass-roots abortion pill distributors — an experience that, while deemed generally safe by medical experts, can be confusing, scary and, at times, deeply traumatic.

## "I feel like I need to push."

"Self-managed" abortions increased dramatically after Roe v. Wade was overturned — with women in antiabortion states obtaining pills through several distinct channels. At least 6,000 women every month in states with bans are now receiving pills from Aid Access, a Europe-based online clinic that prescribes the medication without requiring a patient to interact with a doctor in real time, according to founder Rebecca Gomperts. Thousands of others are turning to at least 25 nonmedical websites that sell the pills, or one of several volunteer-led networks that distribute them for free.

With abortion clinics shuttered across the South and Midwest, many women said they have nowhere to go to confirm that their abortion pill supplier is "legit" or that their symptoms after taking the medication are normal. They worry that a call to a doctor or a trip to the emergency room could land them in jail. And while abortion rights advocates have tried to build new infrastructure to support women in these situations — with volunteer doctors answering phone calls or former abortion providers staffing the occasional bricks-and-mortar office in an antiabortion state — organizers say that such resources are no replacement for the array of choices women had before *Roe* fell.

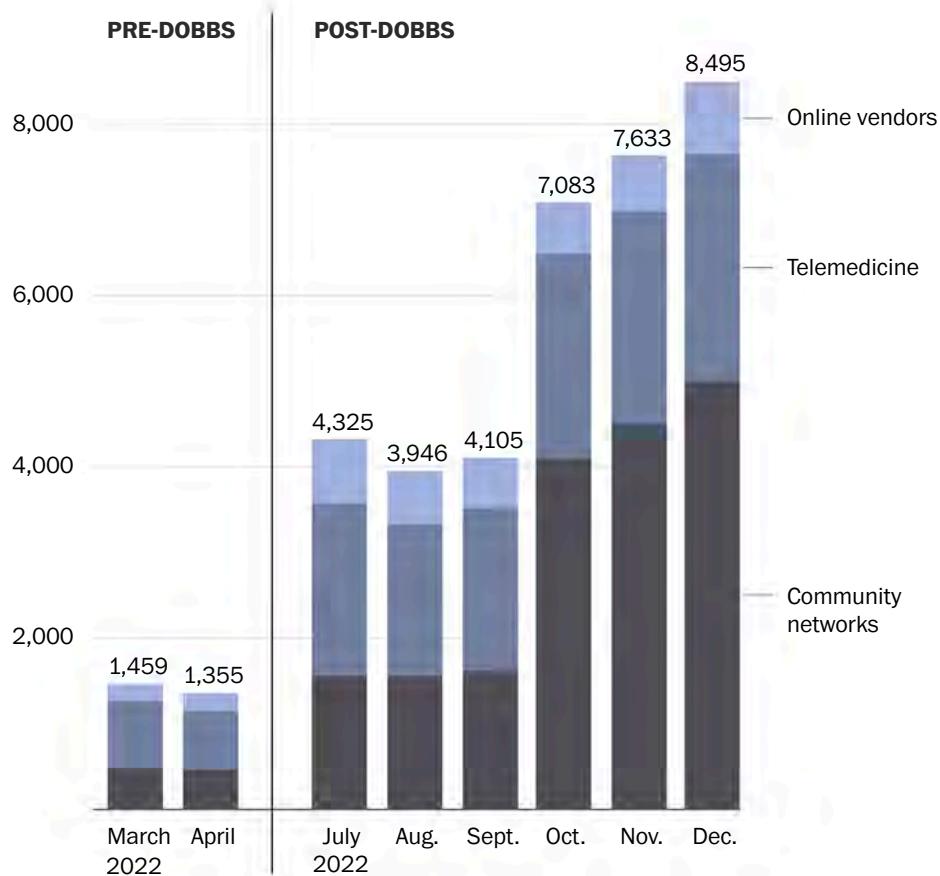
The demand for self-managed abortions in states with bans, already enormous, is sure to increase dramatically in the coming weeks, as strict new abortion laws

"This is not the way health care should be," said Linda Prine, a New York-based doctor who prescribes pills through Aid Access and co-founded a hotline for people taking them. "All the options have been taken away from people by these bans and this is all that's left," she added, referring to the networks providing pills for women self-managing their abortions.

"It really is all we can do."

## Supply of abortion pills for self-managed abortions

The supply of abortion pills outside of the formal health-care setting increased sharply in the six months after *Dobbs v. Jackson Women's Health Organization*, a landmark ruling that eliminated the constitutional right to abortion. A major factor in the increase was the rise of community-based, volunteer-led networks that organized to help women in states with abortion bans.



Source: JAMA (2024)

Adding to the difficulty is a polarized political debate with dueling narratives about what it's actually like to take abortion pills. Antiabortion activists say the pills are highly dangerous, or even deadly, for pregnant women — false assertions based largely on studies that have now been retracted by the journal that published them. Meanwhile, many abortion rights advocates describe the experience as straightforward and easy to handle on your own, a

The Washington Post spoke with more than three dozen doctors, advocates, leading researchers, and women who took the pills in states where abortion has been banned since *Dobbs v. Jackson Women's Health Organization*, the Supreme Court case that overturned *Roe* in June 2022. Over the phone and in person, many women described experiencing deep anxiety and uncertainty about doing something they assumed was illegal. These feelings often intensified after they took the medication, with some not expecting the level of pain or amount of bleeding they would experience, or how much of the fetus they would see. A few used the pills later in pregnancy than the FDA recommends.

"I wish I would have known that it wasn't just blood clots. ... I was really confused and shocked," said Briana, a 34-year-old in Alabama who took pills she ordered online when she was at least five weeks beyond the FDA's 10-week limit. Like other women interviewed for this article, Briana spoke on the condition that her last name not be used so she could discuss sensitive medical information in a state that outlaws abortion — describing her experience in graphic detail because she said she wanted other women to know what to expect.

The complex legal landscape can be hard to understand. Abortion bans do not allow people seeking abortions to be prosecuted, targeting only doctors and others involved in facilitating the abortion. But people have been charged under other laws for self-managing their abortions, especially later in pregnancy.

A legal challenge to the abortion drug mifepristone brought by conservative advocates — which drew skeptical questions from the Supreme Court during oral arguments last month — seeks to further restrict the post-*Roe* landscape by requiring in-person medical visits for all legally administered medication abortions. Such a change could prevent U.S.-based medical providers from mailing pills into antiabortion states under "shield laws," recently enacted in a handful of blue states, that protect doctors from prosecution under red state bans.



Angel pours out her heart medication at her home. (Desiree Rios for The Washington Post)



Angel was worried about how abortion pills might interact with medication she takes for her heart condition.

In Oklahoma, Angel ordered her pills from Aid Access, according to emails reviewed by The Post, and took them five to six weeks into her pregnancy. She'd told doctors at the online clinic about her heart medication when she filled out its online form, she said, but no one ever reached out about it — a silence easily explained, Prine said, because Angel's medication is not one that would raise concerns.

Angel had no way of knowing that.

Sitting on the toilet, she could hear her heart pounding in her ears. She placed two fingers on the side of her neck to take her pulse and started a timer, she recalled — counting about 190 beats per minute.

With her heart condition, she said, she was supposed to seek medical attention if her heart rate got that high.

Angel had no idea who to call. She vaguely remembered a hotline number in the Aid Access instructions, but figured the line would be closed that time of night.

App. 001035

The hospital didn't feel like an option, either: She worried about the questions she might get from suspicious doctors if she showed up at the emergency room.

She closed her eyes and tried to steady her breath, determined to keep her heart rate down. Then she spoke to herself as she imagined a doctor might.

"You will be okay," said Angel, who would wake up the next morning no longer pregnant, the worst moments of her abortion behind her.

"This pain can't last forever."

---

"Your body will be just fine."

"Your uterus knows what to do."

### *A doctor answers panicked calls*

"It's normal to be scared."

"Just wait it out."

"Call back any time."

Linda Prine was answering a few emails, coffee mug in hand, when her cellphone rang.

"Hi, this is the hotline doctor," the 72-year-old said from her New York City home one Sunday morning in January. "Can I help you?"

The voice Prine heard was quiet and scared — belonging to a 15-year-old with an area code in a state with an abortion ban who had taken pills and passed a fetus larger than she'd expected.

Unable to flush the fetus down the toilet, the girl asked about throwing it away.

She was young enough to be Prine's granddaughter.

Prine cradled the phone in both hands and leaned in, trying to channel every ounce of reassurance and understanding she could muster through the phone line.

"There's nothing in there that's traceable back to you," she said. "As long as you don't tell anybody."

The girl asked if the abortion made her a bad person.

"No it doesn't," Prine said. "Not a bit."

"You are doing what's right for you and your future family," she added, her voice firm.

"This way you can be a good mom when you're ready to be a good mom."



Linda Prine answers calls and texts for the Miscarriage and Abortion Hotline. (Natalie Keyssar for The Washington Post)

A semiretired family medicine physician, Prine co-founded the Miscarriage and Abortion Hotline in 2019 as a resource for people self-managing miscarriages or abortions at home. She got the idea from Gomperts, of Aid Access, who had already been mailing pills to Americans who struggled to access abortion. The American patients had a lot of questions and concerns about ordering pills outside a formal health-care setting, Gomperts told Prine — and her inbox was constantly flooded with emails.

## “You are doing what’s right for you and your future family.”

Calls to the hotline surged after Texas enacted an early law banning most abortions in the fall of 2021, Prine said, and again after new abortion bans took effect across the South and Midwest when *Roe* fell. Now the line is staffed by over 50 U.S.-based medical providers who volunteer their time, a mix of doctors, midwives, nurse practitioners and physician assistants with experience in abortion care. The doctors who run the hotline recruit volunteers through word-of-mouth recommendations, then administer a few hours of virtual training before they start.

In interviews, Prine stressed that hotline doctors are not practicing medicine under their licenses or establishing a doctor-patient relationship — a posture Prine said legally protects the physicians. By design, the hotline volunteers don’t ask for the names, locations or full medical histories of the people who call. On the hotline’s website, a disclaimer notes that they are not offering “legal or medical advice,” and that the information they provide “does not substitute for the ... advice of a doctor.”

The hotline typically receives roughly 30 calls and 50 texts from people every day. Many say they are in states that ban abortion.

“They’ll say, ‘I’m in a state where this is illegal, so I can’t go get medical care. I want to check in and make sure everything is going okay,’” Prine said.

She and her colleagues hear the same questions again and again: Am I bleeding too much? Am I not bleeding enough? Is it normal to have this much pain? People call to see if they can drink alcohol or smoke marijuana after taking the pills. One woman asked whether it was safe to walk up the stairs.

### [What to know after taking abortion pills]

Anxiety and uncertainty are common even among patients who receive the medication at an abortion clinic in a state where abortion is legal, said Prine — because they’re at home by the time they start feeling the full effects.

“People from anywhere can be freaking out because everyone is taking these pills at home alone,” Prine said.

Still, some feel better taking the pills after having a direct conversation with a medical professional. Since *Dobbs*, many women in antiabortion states who

have the resources to travel have continued to leave the state to obtain pills at a clinic instead of ordering online, preferring the experience of being face to face with a doctor, even if it means a long drive or a flight.



The Miscarriage and Abortion Hotline is staffed by over 50 U.S.-based medical providers, a mix of doctors, midwives, nurse practitioners and physician assistants with experience in abortion care. (Natalie Keyssar for The Washington Post)



A cross stitch at the home of Linda Prine.

For those who choose to self-manage their abortions, Prine said, she is there to offer reassurance that their experiences are nothing out of the ordinary, and that they almost certainly don't need to go to the emergency room. A medication abortion is just like a miscarriage, she'll tell them, with hundreds of women going through the same process every day.

Of the approximately 5.9 million patients in the United States who took mifepristone — the first drug in a two-step medication abortion regimen — between its 2000 approval and December 2022, just 32 died, according to the FDA. Those cases, the agency says, “cannot with certainty be causally attributed to mifepristone.” Major adverse events — in which a blood transfusion, major surgery or overnight hospital stay is required — occur in fewer than 0.5 percent of cases, a figure that remains the same whether a patient has met with a doctor in person.

A significantly larger share of patients who take abortion pills seek emergency care, ranging from 1.3 to 8 percent in leading studies.

### **Adverse effects are extremely rare among those who take abortion pills**

A tiny fraction of patients who take abortion pills have a serious adverse event such as a blood transfusion, major surgery or overnight hospital stay.

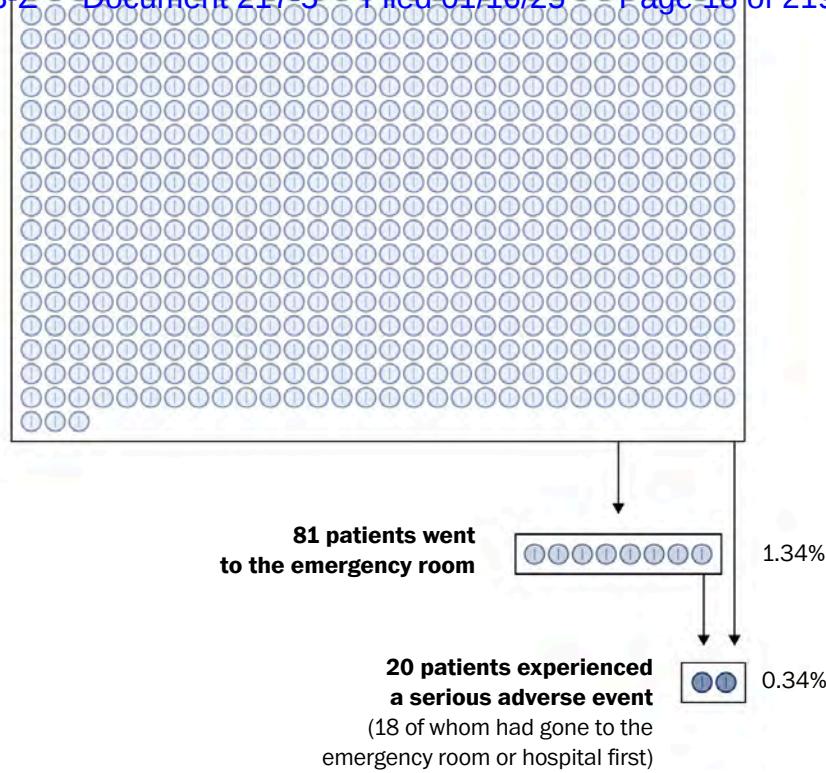
⌚ = 10 estimated patients who took abortion pills

**6,034 patients took abortion pills**



100%

App. 001039



Note: Estimated patient numbers are based on percentages included in a 2024 study and are rounded to whole people.

Source: Ushma Upadhyay/Nature Medicine

Antiabortion activists portray those emergency room visits as an indication of a safety issue, but leading medical experts say they instead highlight the confusion and fear that many women experience after taking the pills. Patients often go for a gut check, doctors and medical researchers said, wanting to confirm that they're not bleeding too much, or that the pills worked and they are no longer pregnant. Studies show that 35 to 50 percent of people who go to an ER after taking abortion pills receive no treatment.

"With medication abortion, there's no one saying, 'You're doing great. This is normal,'" said Ushma Upadhyay, a professor at the University of California at San Francisco and a leading researcher on the safety of abortion pills, drawing a distinction between the pill and a surgical procedure. "Often people are going through it alone, so they want to know everything is okay."

On the hotline, Prine said she's felt the need to send someone to the emergency room only once in nearly five years.

"Your uterus knows what to do," Prine told a woman who called that January morning with reports of unexpectedly heavy bleeding. "It's going to take care of itself."

Others in the medical community are quicker to suggest that someone be seen in

On the infrequent occasions when a patient calls with concerns about their medication abortion, Clayton Alfonso, an OB/GYN at Duke University, said he'll try to evaluate how much she is bleeding and how her body is tolerating the blood loss. But he said it can sometimes be difficult to make those assessments over the phone.

"When you take a patient call, it's always hard because their definition of heavy bleeding could be different from my definition of heavy bleeding," said Alfonso, adding that he usually tries to bring patients into his clinic if he has space on the schedule. "I would much rather see someone than leave someone in limbo at home not knowing what to do."

In states with abortion bans, the emergency room is often the only option for women who want in-person care during their medication abortions. Even if they say they had a miscarriage — a condition that presents with symptoms indistinguishable from a medication abortion — many women in these situations have bad experiences at the hospital, Prine said, encountering physicians who provide inaccurate information or ask suspicious questions about why they're bleeding.

## “Your uterus knows what to do.”

Prine said she recognizes that the landscape for self-managed abortions is tenuous. The antiabortion movement is ready to seize on any experience with pills that is difficult or complicated, she said, especially the relatively rare cases in which women take pills later in pregnancy.

At the Conservative Political Action Conference last year, prominent antiabortion activist Abby Johnson said women are delivering “fully formed babies” in their bathrooms — a false description of what women see during a medication abortion, even in the second trimester.

“They’re passing these babies into the toilet,” said Johnson, founder of the antiabortion group And Then There Were None. “Then these women have to make a decision: What do I do with this fully formed baby?... Do I flush my child down the toilet?”

These kinds of incendiary attacks make it hard for abortion rights advocates to discuss the details of a medication abortion later in pregnancy, said Prine and Gomperts — because the specifics could be weaponized by the antiabortion movement.

As a result, Prine said, women who take pills later in pregnancy are sometimes surprised by what they see.

---

“How much bleeding is normal?”

“Do I push it out?”

### *A woman struggles to pass her pregnancy*

“Should I go to the hospital?”

“I’m totally alone.”

At her home in Alabama, Briana waited to take the pills until she’d put all of her children to sleep.

The cramps in her lower back came first, followed by full-body chills and, eventually, contractions more painful than those she remembered from childbirth.

After lying in bed for two hours, Briana felt something “pop” under the comforter, followed by a gush of warm liquid seeping down her legs. She ran to the bathroom, she recalled in interviews and a journal entry, where she felt a mass larger than her palm drop into the toilet.

“This can’t be happening,” she thought to herself.

Then she looked down to see a bloody umbilical cord dangling between her legs.



When the pills first arrived in the mail a few days earlier, in April 2023, Briana had expected her experience would be more difficult than most. The doctors who administered the medication through Aid Access cautioned Briana that they “do

App. 001042

not like to recommend medical abortions" as far into pregnancy as she would be when the pills reached her, according to emails reviewed by The Post.

Briana felt she had no choice. By the time she found out she was pregnant, she was already 11 or 12 weeks along. The abortion clinic she'd called in a different state, more than a six-hour drive from her home in Alabama, where abortion is banned, was booked for surgical procedures for over a month, busy treating patients from other antiabortion states across the South. She spent nearly two weeks researching her other options, then the pills she ordered took two weeks to arrive.

The 34-year-old was struggling to support the kids she already had.

"I didn't want to take any more away from them ... time, attention, money," said Briana, who estimates that she was 15 or 16 weeks along when she took the pills.

## "This can't be happening."

Experts and advocates say it is relatively rare for women to self-manage their abortions well beyond the FDA's 10-week limit, particularly since passage of the shield laws, allowing U.S.-based doctors to mail pills directly into antiabortion states instead of relying on international pharmacies. That change has reduced the shipment time from several weeks to between three and five days.

At the time Briana ordered her medication, over a year ago, Aid Access generally did not send pills to anyone who said they were further than 11 weeks into their pregnancy, Gomperts said. It now allows people to place orders through 12 weeks of pregnancy, because pills reach patients more quickly.

"If we think people might be longer than that, they get an email to make sure they can navigate the situation," said Gomperts, who personally prescribed Briana's medication, according to documentation reviewed by The Post.

"Women have agency. They are perfectly capable of making these choices about their own health, and we are there to support them the best we can."

According to data compiled by Aid Access, and shared with The Post, 1 in 20 patients who responded to the organization's survey in January took the pills beyond 11 weeks of pregnancy. One in 100 took the pills beyond 13 weeks. (About 20 percent of people who took the pills responded to the survey.)

Still, Prine said, she has fielded far more of these calls from women later in pregnancy than she would like — averaging one a day on the hotline in the months after the Supreme Court decision. Some of the callers had no idea how

Beyond 12 or 13 weeks, women will see a much more developed fetus, with identifiable features.

“We hear the trauma when we talk to people,” Prine said. “It’s an image you can’t get out of your head.”

#### How we reported this story

Caroline Kitchener reported this story from four states. She witnessed Ashley’s ultrasound in Texas, watched Linda Prine answer hotline calls in New York, and interviewed Angel and Briana in Oklahoma and Alabama. She also spoke on the phone to women who self-managed their abortions at home.

• • •

Alone in her bathroom, Briana had no idea what to do. The Aid Access doctors had told her to expect nausea, vomiting, chills, blood clots and a fetus at least the size of an orange, emails show.

They said nothing about an umbilical cord.

“Do I pull the cord out?” Briana wondered, frantically trying to remember what the doctors had done when she gave birth. “Do I just wait to try to push it out?”

Her boyfriend was sleeping in the next room. Even if she woke him up, she wondered, what could he do? If she went to the emergency room, she said, she felt sure she’d be prosecuted.

Finally, Briana decided to call the number for the Miscarriage and Abortion Hotline she’d seen in an email from Aid Access.

“That’s the placenta you need to push out,” Briana recalled the woman on the hotline saying. “When you feel the next contraction, I want you to push like you’re giving birth.”

Briana said she sat there with her umbilical cord hanging loose for at least 15 minutes before the placenta finally dropped into the toilet.



While there are no major U.S.-based studies on the experience of self-managing an abortion with pills later in pregnancy, international research suggests that women in these situations more frequently seek in-person care. One study conducted with patients in Argentina, Nigeria and Southeast Asia between nine and 16 weeks of pregnancy found that about 24 percent went to a medical facility during or after the experience of taking the pills on their own. Approximately 10 percent required medical intervention to complete the abortion or treat a complication.

One major concern later in pregnancy is that the body won't be able to expel all of the pregnancy tissue, several doctors said.

When the Miscarriage and Abortion Hotline received its first call from a woman who was unable to pass her placenta — at least five weeks further into her pregnancy than the FDA's 10-week limit — a group of hotline doctors started messaging one another, trying to decide what to say to her, Prine said.

One doctor in the group insisted that the woman had to go straight to the ER, but Prine and others disagreed. Worried the woman could face prosecution or mistreatment if she went to the hospital, Prine said, they walked her through her abortion at home, instructing her to take more abortion pills and gently massage her stomach until the placenta came free — the same advice Briana said she received.

"We didn't feel like it was a medical emergency. She wasn't bleeding heavily and she wasn't lightheaded," said Prine, adding that they would have recommended the woman go the ER if a hospital visit was medically necessary.

A woman in that situation could have hemorrhaged or become septic, according to five OB/GYNs interviewed for this article.

"Whenever there is something inside the uterus that is trying to come out and won't come out, the risk of bleeding and infection gets higher with every passing moment," said Keri Garel, an OB/GYN at Boston Medical Center, adding that she would advise someone in Briana's situation to go to the hospital immediately. "At that point, your life is the most important thing."

## “Do I pull the cord out?”

As difficult as the situation was, Briana says she is extremely grateful that Aid Access was willing to send her the pills — and that someone on the hotline was

"Without the hotline I would have been completely lost and literally completely alone," she said.

"The lady ... stayed talking to me for hours," Briana added. "I wish I knew her name."

Briana stayed in the bathroom that night for more than an hour. She knew she shouldn't look at the fetus, she said, but she couldn't help it. In the toilet bowl, she could make out a head. She remembered thinking that the legs looked long.

"I felt like a monster," she said, reflecting back on that moment.

A year later, Briana said, she is certain she made the right decision for herself and her family. But she wishes someone had told her more about what to expect. If she had known the full extent of what could happen during a medication abortion at 15 or 16 weeks, she said, she probably would have searched harder for an out-of-state clinic with available appointments — and figured out a way to drive six hours or more to Florida, Illinois or North Carolina.

Before *Roe v. Wade* was overturned, Briana could have gone to a clinic less than 30 minutes from her house.

---

"We can see you tomorrow."

"Here's what you should expect."

### *A former abortion provider offers some relief*

"That website is real."

"You are going to get through this."

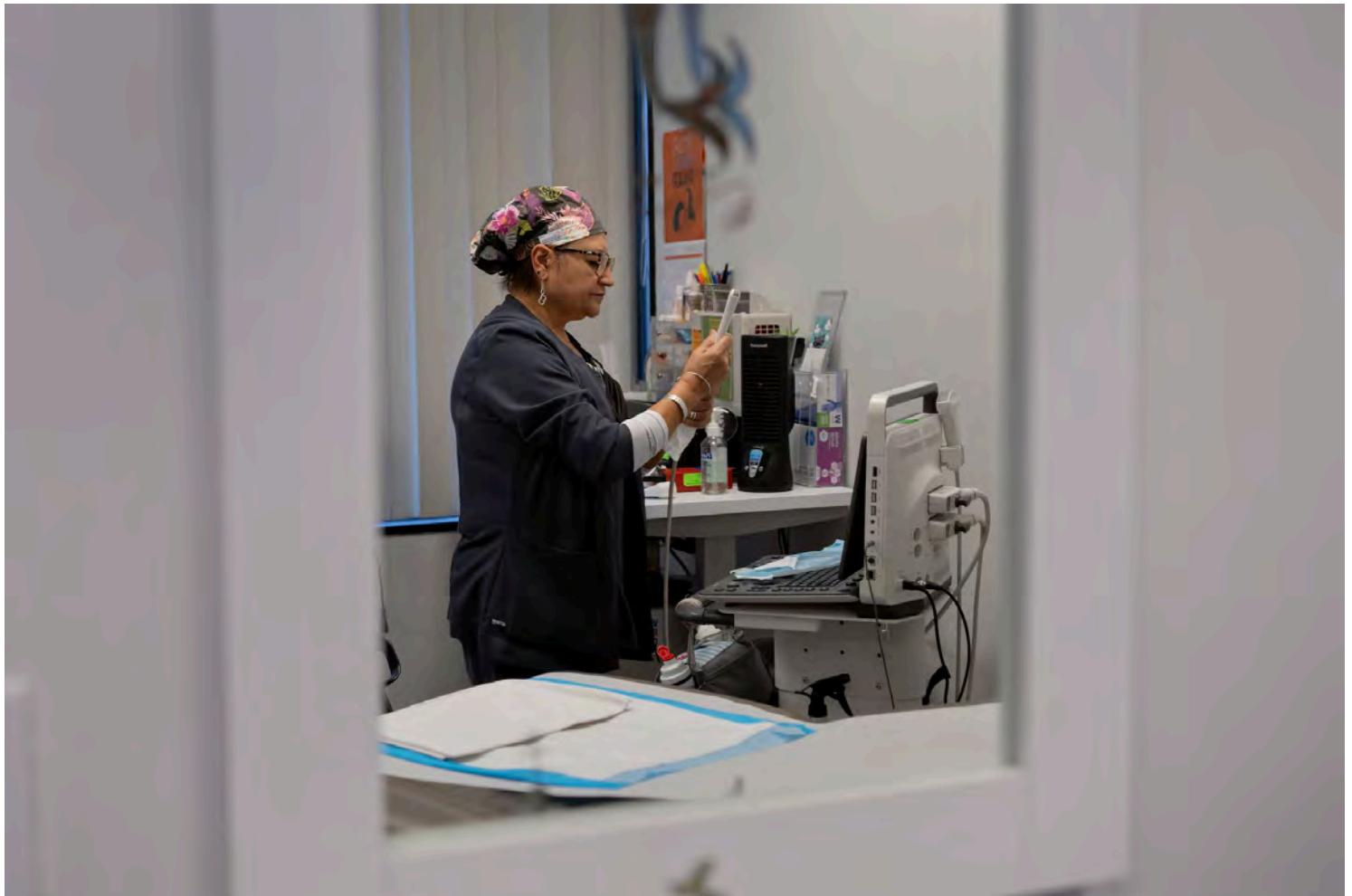
"Your uterus looks beautiful."

In Houston, a woman lay back on an exam table in a clinic that once offered abortions, hoping to hear that her medication abortion was finally complete.

Ashley, a 25-year-old mother with a baby, opened her legs and stared up at a mermaid mobile hanging from the ceiling, her sweatpants and Converse

"Are you ready?" Glenda Lima, the sonographer, asked on a Tuesday morning in mid-February. "There will be a little cold and just a little pressure, okay?"

It was Ashley's fourth visit in two months to Houston Women's Reproductive Services, one of a handful of former abortion clinics that have remained open in states with near-total abortion bans. While the staff originally imagined a new version of the clinic that offered ultrasounds and referrals to patients planning to travel out of state for medication and procedures, a large share of the women they serve are now self-managing their abortions with pills they got online.



Glenda Lima cleans ultrasound equipment at Houston Women's Reproductive Services in Texas. (Danielle Villasana for The Washington Post)

As soon as she found out she was pregnant in mid-December, Ashley had ordered pills from Aid Access, which she'd heard about on TikTok. But the whole process seemed a little sketchy, she said. What kind of medical organization collected money through Venmo, she wondered? They were asking for a picture of her driver's license. What if it was all a scam?

She decided that she needed to talk to someone. Not a disembodied voice on the phone or an anonymous commenter in an online forum — but a real, live person

"If I'm putting this in my body," Ashley recalled thinking to herself, "I need to know I'm going to be okay."

Ashley struggled to come up with the right terms to Google, she said, wondering if it was even possible to get advice on abortions in a state where abortion is banned. She came across contact information for Houston Women's Reproductive Services only after first messaging a crisis pregnancy center — an email thread she abandoned when she realized it was actually an antiabortion organization designed to dissuade women from ending their pregnancies.

Kathy Kleinfeld, the administrator of Houston Women's, responded to Ashley's panicked message on a Sunday, offering her an appointment for a pre-abortion ultrasound and consultation the next day the clinic was open.

"I was like, 'Oh my God, I feel like I have been searching for this,'" Ashley said. For the first time since finding out she was pregnant, she said, "I just felt safe."



Glenda Lima performs an ultrasound for a patient at Houston Women's Reproductive Services. (Danielle Villasana for The Washington Post)



A patient holds her hands while getting an ultrasound at Houston Women's Reproductive Services.

As other Texas clinics moved to New Mexico and Illinois after *Roe* was overturned, Kleinfeld and Lima decided to downsize and stay put, anticipating that some women would continue to seek out ultrasounds, emotional support and general guidance in their home state, services that remain legal under Texas law. If all the abortion clinics shuttered, they said, they knew crisis pregnancy centers would be the only places left to go.

Now, the women see their clinic as a helpful counterpart to the online pill networks: a soothing space with a "relaxation" scented diffuser and three portraits of the late Supreme Court justice Ruth Bader Ginsburg, where Texans

There are major challenges to providing this kind of care in a state where abortion is illegal. Perhaps the biggest, Lima said, is that women assume there are no abortion resources left in Texas. Those that find them often do so by chance.

Lima said she regularly gets frantic calls and texts from Spanish-speaking patients she's never met before on her cellphone, a number she gives out only to patients she sees in the clinic.

"I ask them, 'How did you get my number?'" she said. "They say, 'A friend of a friend of a friend.'"

## "I need to know I'm going to be okay."

Kleinfeld acknowledges that the very existence of a clinic like theirs — which, unlike some other former abortion clinics that have remained open in states with bans, has no doctors on site and offers no health services other than ultrasounds — is somewhat controversial in the abortion rights community. With abortion rights advocates arguing vehemently that in-person consultations and ultrasounds are entirely unnecessary for a medication abortion, Kleinfeld said, some likely see her clinic as an impediment to women accessing the care they need.

Kleinfeld would never want to see an in-person visit mandated for all patients — most women have no problem handling everything at home, she said. But she has learned that some need the additional hand-holding, especially when they are obtaining pills from unfamiliar sources.

"Not everybody needs an ultrasound, not everyone needs a phone number to call," Kleinfeld said. "But some really do."

Blair Cushing, a family medicine doctor who provided abortions in McAllen, Tex., before the clinic there was forced to close, recently opened a small medical practice near the Mexico border to offer ultrasounds and other support to women who self-manage their abortions. When she meets with patients, she said, they'll often stay to talk for an hour or more — experiencing "information overwhelm" from everything they've read online and desperate for reassurance.

"They're worried because something didn't go the way they were expecting," Cushing said. "They need to decompress about this experience they had and make sure they're okay."



Ashley holds her baby at her home. (Danielle Villasana for The Washington Post)



As soon as she found out she was pregnant in mid-December, Ashley ordered pills from Aid Access.

Ashley first went to Houston Women's Reproductive Services for an ultrasound before she took the pills on Dec. 19 — then returned a week later, wondering why she was still bleeding and experiencing a dull pain in her lower back.

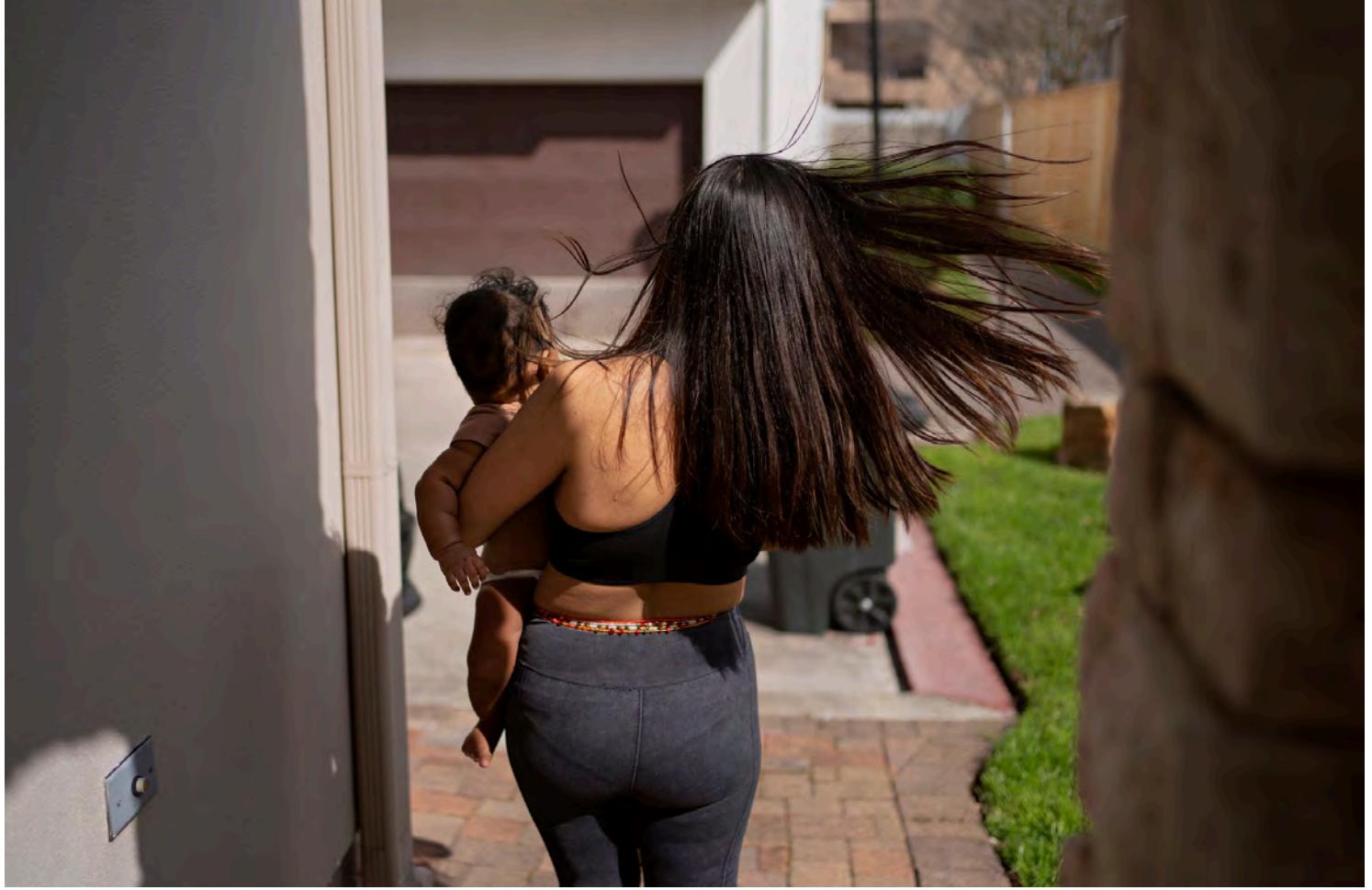
Lima, the sonographer, told Ashley that she still had some blood clots left in her uterus. And while Lima assured her that this was nothing to worry about — the body can typically expel remaining clots without any medical intervention — Ashley wanted to be sure.

She returned to Houston Women's for three more appointments, until Lima was able to confirm that all the clots were gone.

"Your uterus looks beautiful ... nice and clean," Lima said at Ashley's final appointment in mid-February. "You're good to go, okay?"

Ashley smiled, closing her eyes as she felt all the muscles in her shoulders finally relax.

"Thank you," she said. "That's all I needed to hear."



Ashley carries her baby outside her home. (Danielle Villasana for The Washington Post)

#### About this story

Editing by Peter Wallsten. Photo editing by Natalia Jimenez. Copy editing by Thomas Heleba and Martha Murdock. Design editing by Madison Walls. Graphics editing by Emily M. Eng. Graphics reporting by N. Kirkpatrick. Design and development by Agnes Lee. Andrew Tran contributed to this report.

#### THE U.S. FIGHT OVER ABORTION

#### HAND-CURATED

States where abortion is legal, banned or under threat

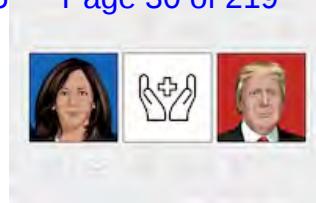
Sept. 12, 2024

■ Blue: abortion rights protected  
■ Red: banned after 20 or 22 weeks  
■ Grey: abortion is legal



Harris vs. Trump on abortion: Where they stand on the issue

Sept. 10, 2024



Nebraska high court allows competing abortion measures on fall ballot

Sept. 13, 2024

[View all 18 stories](#)[1925 Comments](#)[Caroline Kitchener](#)Caroline Kitchener is a reporter covering abortion at The Washington Post. She won the 2023 Pulitzer Prize for National Reporting.  [@CAKitchener](#)

Subscribe to comment and get the full experience. Choose your plan →

## Most Read

## 1 Thousands injured in Lebanon as pagers used by Hezbollah explode

---

2 Vance had better buckle up: His debate might go as badly as Trump's

---

3 Not ready for a knee replacement? You might be able to fix your cartilage instead.

---

4 Court may decide if Arizonans with missing citizenship records can vote in state races

---

5 The Searchers

---

---

**washingtonpost.com**

© 1996-2024 The Washington Post

[About The Post](#)

[Contact the Newsroom](#)

[Contact Customer Care](#)

[Request a Correction](#)

[Send a News Tip](#)

[Download the Washington Post App](#)[Policies & Standards](#)[Terms of Service](#)[Privacy Policy](#)[Cookie Settings](#)[Print Products Terms of Sale](#)[Digital Products Terms of Sale](#)[Submissions & Discussion Policy](#)[Sitemap](#)[RSS Terms of Service](#)[Ad Choices](#)[Your Privacy Choices !\[\]\(7490bbd2236eba0faf0313a0183fefb3\_img.jpg\) !\[\]\(7141a59767888494790020272585b5fe\_img.jpg\)](#)

## **EXHIBIT 67**

**Plan C – Where people get abortion pills online in Texas**

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#)[Español](#)[Plan C Guide > Texas](#)

# Where people get abortion pills online in Texas

Abortion access in Texas is restricted, but abortion pills are still available by mail from providers outside of Texas. Options below.

[Show my options](#)[Learn about potential legal risk](#)[Pregnancy Calculator](#)

⚠ Please note:

Plan C does not sell pills. Use this guide to find an abortion pill provider.



[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#)[Español](#)

## Online clinics that mail pills

For people who want abortion pills by mail and follow-up support from a clinician.

\$150 or less

1-5 days

Clinician support

FDA-approved medications

Potential legal risk

[See 8 results](#)

## Websites that sell pills

For people who want abortion pills by mail without consulting a clinician.

\$30 and up

3-9 days

Generic medications (from India)

Potential legal risk

[See 13 results](#)

## Community networks that mail pills

For people who can't afford other services and want free pills mailed by volunteers.

Free

5-10 days

Generic medications (from India)

Potential legal risk

[See 1 result](#)

## In-person clinics

For people who have access to transportation and would prefer to pick up abortion pills in person from an abortion clinic.

\$500 or more

Clinician support

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#)[Español](#)

⚠ Learn about potential legal risks of accessing pills from alternative suppliers by reading the FAQ below, "Can I get in trouble for using abortion pills?"

You can also contact the free, confidential Repro Legal Helpline ([online](#) or at 844-868-2812) to discuss your specific situation.

## Can I get in trouble for using abortion pills?



The short answer is: it depends, and it's complicated.

Legal risk can depend on:

- where you live,
- your identity: race, ethnicity, income level, etc.
- and how far along you are in pregnancy.

In the end, it's up to each person to make their own decision about risk. Click the headings below for more information about these risks.

**Where someone lives makes a difference.**



**What if a state totally bans abortion?**



[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#)[Español](#)

#### Have Legal Questions?

The [Repro Legal Helpline](#) provides free and confidential legal advice that can help people better understand the laws and legal risk they may face. Contact them [online](#) or call **844-868-2812**.

For more analysis of potential legal risk, [read this article](#).

#### How do I choose from these provider types?

Here are a few factors to consider when choosing a provider type:

What kind of support do you want?

How much will it cost?

How long will it take to get pills?

Other important factors

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#)[Español](#)

## Online clinics that mail pills

### US-based online clinics

Online clinics are US-licensed clinicians who ship pills to you after a brief online form or phone/video visit. Follow up support is available.



#### Why are online clinics listed if my state does not allow telehealth for abortion?



This is possible because some states have “shield laws” in place that protect clinicians when they provide telehealth care to someone in another state. [Read our FAQ](#) about potential legal risks of getting abortion pills by mail and taking them in a state that restricts access. If you want to speak to someone about legal risk, contact the [Repro Legal Helpline](#).

For more information about shield laws, [read this article](#).

#### How do I choose a provider?



People usually choose an online clinic based on what kind of telehealth care they are comfortable with. Some providers require a phone or video visit while other providers communicate with you through text or email.


[Find Pills](#)
[FAQ](#) ▾

[Support & Resources](#) ▾

[Get Involved](#) ▾

[About Plan C](#) ▾

[Donate](#)
[Español](#)

## What if I have medical questions?



Online clinics usually offer medical support during and after your abortion. The format of this care depends on the provider. Some providers use phone or video visits (we call this a “Virtual visit with provider”) while others communicate through text or email (we call this “Online consultation by form”).

You can also get free medical support from [The Miscarriage and Abortion Hotline](#), which provides confidential medical information and support by phone and text to anyone in any state.

**Important:** If you live in an abortion restrictive state and are traveling to another state to receive telehealth care, the provider will not be able to provide care to you if you tell them you have returned to the restrictive state.

### Filter by:

 Accepts insurance

 Accepts Medicaid

 Sliding scale pricing

 Get pills in advance

 Se habla español

**Showing 5 of 5 results**

Sort by: **Price** ▾

### AID ACCESS

Price

**\$150 or less**

Delivery

**2-5 days**

Ages

**All**

### ARMADILLO CLINIC

Price

**\$200 or less**

Delivery

**2-5 days**

Ages

**18+**

### CAMBRIDGE REPRODUCTIVE HEALTH CONSULTANTS

Price

Delivery

Ages

App. 001061

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#)[Español](#)
 Financial assistance available

 [Learn about the potential legal risk of using this service](#)
[MORE INFORMATION](#)[↗ REQUEST PILLS](#)[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

## WE TAKE CARE OF US

Price **\$150-\$600** Delivery **1-5 days** Ages **All**

Pills by mail with clinician support (hablamos español)

For pregnancies up to 12 weeks

 Get pills in advance

 Financial assistance available

 [Learn about the potential legal risk of using this service](#)
[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

## A SAFE CHOICE

Price **\$150** Delivery **1-5 days** Ages **All**

Pills by mail with clinician support

For pregnancies up to 13 weeks

 Get pills in advance

 [Learn about the potential legal risk of using this service](#)
[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

## International online clinics

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#)[Español](#)

Showing 3 of 3 results

### ABORTION PILLS IN PRIVATE

Price **\$90** Delivery **8-14 days** Ages **16+**

Pills by mail with clinician support  
For pregnancies up to 11 weeks

No financial assistance available

[Learn about the potential legal risk of using this service](#)

[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

### WOMEN ON WEB

Price **\$120 or less** Delivery **3-5 business days** Ages **All**

Pills by mail with clinician support (Hablamos Español/falamos Português)  
For pregnancies up to 12 weeks

Get pills in advance

Financial assistance available

[Learn about the potential legal risk of using this service](#)

[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

### TELEFEM MEXICO

Price **\$200** Delivery **3 days** Ages **All**

Pills by mail with clinician support, Hablamos Español--SHIPS TO MEXICO ADDRESSES ONLY, BUT CAN BE PICKED UP ALONG U.S. BORDER AT COURIER LOCATIONS

For pregnancies up to 10 weeks

No financial assistance available

[MORE INFORMATION](#)[↗ REQUEST PILLS](#)[Back to top ^](#)

## Websites that sell pills

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#)[Español](#)

our [digital privacy tips](#) to learn how to protect yourself when ordering or searching for abortion pills online.

Read the FAQs below for more information on how these sites work.



#### What are websites that sell pills?



Websites that sell pills are e-commerce websites that sell and ship pills to addresses in all U.S. states. They do not require a prescription for the medications, do not require you to upload your ID, and do not provide a medical consultation or any kind of support.

#### Are these websites legit?



Yes, these websites are legit. They sell generic abortion pills that are not regulated or inspected by the US government. Plan C regularly tests these websites by buying pills from them. The services we list in our guide all shipped pills to a home address. The pills were real (based on laboratory testing). But, we do not operate these sites, and cannot guarantee they will be reliable in the future.

**Important:** These websites may not follow strict digital security protocols. Read our [digital privacy tips](#) to learn how to protect yourself when ordering or searching for abortion pills online.

#### How do I choose one of these websites?



[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#)[Español](#)

We suggest you check their website and pick the one that you feel most comfortable ordering from. If you are not sure what pills to order, read the FAQ below, “What kind of kit do I order?”.

#### What kind of kit do I order?



Most of these websites sell abortion pills in a blister pack called an MTP Kit. These kits usually contain 5 pills: 1 dose of mifepristone (1 pill) and 1 dose of misoprostol (4 pills). Sometimes these packs will be listed under different names, or will be sold in bulk quantities, which may seem confusing. What is important is that you get the correct dosage for your pregnancy.

Read the next section “How many pills do I need?” for dosage information.

**Important note about payment:** It is very common for these websites to email or call soon after they get your order to request a different form of payment. They often say the credit card did not go through. They often ask the buyer to use a PayPal account in a person’s name or in the name of another business. These payment requests do seem unusual, but they worked every time we tested them.

The pills usually arrive by the US Postal Service. They usually do not require a signature.

#### How many pills do I need?



If you are *under 9 weeks* pregnant you usually need 1 mifepristone pill and 4 misoprostol pills.

**People who are more than 9 weeks pregnant may need additional misoprostol pills (4 or 8 pills) to complete the abortion.** Many of these websites sell misoprostol pills separately (sometimes called Cytotec or Cytolog), which can be added to your order.

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#)[Español](#)

## What if I have medical questions?



Websites that sell pills do not offer medical support. If you have medical questions during your abortion, you can get support and have your questions answered by contacting [The Miscarriage and Abortion Hotline](#). This hotline provides free, confidential medical information and support by phone and text. Often they can help you address a problem without needing to go to a clinic or hospital.

If you are experiencing complications and feel the need to seek care from a health care provider at a clinic or hospital, you should do so. Your clinician does not need to know that you have used abortion pills to provide appropriate follow up care. Clinicians also can't tell you've taken abortion pills unless you tell them, or if you inserted the misoprostol vaginally and the pills did not fully dissolve. Many people use misoprostol orally to prevent this possible detection.

Some people who have told their clinician that they used abortion pills have faced legal prosecution. This is why many people just say they are having a miscarriage. The symptoms after taking abortion pills are the same as a miscarriage, and [blood tests do not reveal any differences between a miscarriage and a medication abortion](#).

You can also get free, nonjudgmental emotional support before, during, and after your abortion from the folks at [All-Options Talkline](#), [Exhale](#), [Faith Aloud](#), or [Reprocare](#).

Showing 4 of 13 results

Sort by: [Price](#) ▾

LIFE EASY ON PILLS

HOME ABORTIONRX

PRIVATE EMMA

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#)[Español](#) [Get pills in advance](#)

[Learn about the potential legal risk of using this service](#)

[MORE INFORMATION](#) [REQUEST PILLS](#) [Get pills in advance](#)

[Learn about the potential legal risk of using this service](#)

[MORE INFORMATION](#) [REQUEST PILLS](#) [Get pills in advance](#)

Financial assistance available

[Learn about the potential legal risk of using this service](#)

[MORE INFORMATION](#) [REQUEST PILLS](#)

## MEDSIDE 24

Price

Delivery

Ages

**\$44****3-6 business days****All**

Pills by mail

 [Get pills in advance](#)

[Learn about the potential legal risk of using this service](#)

[MORE INFORMATION](#) [REQUEST PILLS](#)[See all 13 websites that sell pills](#)

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#)[Español](#)

## Community networks that mail pills

These are networks of volunteers in the US that ship generic abortion pills for free. The pills often come repackaged in plastic baggies. You will need to request pills by email.



### What are community support networks?

These are networks of community-based volunteers who ship generic abortion pills to people in the U.S. with confirmed pregnancies. They believe in a model of community care and ship pills for free. The pills often come repackaged in plastic or mylar baggies.

### What if I have medical questions?

Community support networks sometimes offer emotional or medical support through secure texting apps. You can also get support and have your medical questions answered by contacting [The Miscarriage and Abortion Hotline](#). This hotline provides free, confidential medical information and support by phone and text. Often they can help you address a problem without needing to go to a clinic or hospital.

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#)[Español](#)

and the pills did not fully dissolve. Many people use misoprostol orally to prevent this possible detection.

Some people who have told their clinician that they used abortion pills have faced legal prosecution. This is why many people just say they are having a miscarriage. The symptoms after taking abortion pills are the same as a miscarriage, and **blood tests do not reveal any differences between a miscarriage and a medication abortion.**

You can also get free, nonjudgmental emotional support before, during, and after your abortion from the folks at **All-Options Talkline, Exhale, Faith Aloud, or Reprocare.**

## Showing 1 of 1 results

### LAS LIBRES

Price              Delivery              Ages  
**\$0**              **5-12 days**              **All**

Community network that mails pills

[Learn about the potential legal risk of using this service](#)

[MORE INFORMATION](#) [REQUEST PILLS](#)

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#)[Español](#)

## In-person clinics

Clinics offer abortion pill pickup and other in-person abortion care options. To find the nearest clinic to Texas, use any of these search tools:



### I Need an Abortion

A comprehensive, regularly updated, and personalized resource for abortion seekers in the US.

[\*\*» VISIT WEBSITE\*\*](#)

### Texas: Abortion Clinic Guide

Information about Texas abortion clinics, nearby clinic options, and financial assistance from local support resources.

[\*\*» VISIT WEBSITE\*\*](#)[Back to top ^](#)

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#)[Español](#)

## Live phone & text support

### For Medical Questions

#### The M+A Hotline

Free and confidential support from a clinician at the Miscarriage + Abortion Hotline. (M+A does not sell pills)

[CALL OR TEXT](#)[↗ VISIT WEBSITE](#)

### For Logistical & Emotional Support

#### ReproCare Healthline

Free and confidential help understanding how to get pills and how to use them.

[CALL OR TEXT](#)[↗ VISIT WEBSITE](#)

### For Legal Questions

#### ReproLegal Helpline

Connect with a lawyer for free and confidential legal information.

[CALL OR TEXT](#)[↗ VISIT WEBSITE](#)

## Automated support

**NEW**

### Charley the Chatbot

Provides users with personalized abortion options, including information about different

### Frequently Asked Questions

Get answers to common questions about how abortion pills work and how to access them.




[Find Pills](#)
[FAQ](#) ▾

[Support & Resources](#) ▾

[Get Involved](#) ▾

[About Plan C](#) ▾

[Donate](#)
[Español](#)
[View Website](#)


## Get the Plan C Newsletter

For breaking developments in abortion pill access and opportunities to take action.

[Sign Up](#)


Plan C is a project under the fiscal sponsorship of the National Women's Health Network, a 501c3 organization. Our generous donors make this critical work possible.

[Find Pills →](#)


### FAQ

- [Finding Abortion Pills](#)
- [About Abortion Pills](#)
- [Using Abortion Pills](#)
- [Can I get in Trouble for Using Abortion Pills?](#)

### Support and Resources

- [Quick Resource List](#)
- [Medical + Emotional Support](#)
- [Legal Support](#)
- [Financial Support](#)
- [Abortion Pill Instructions](#)
- [Abortion Care Apps](#)
- [Other Options for Getting an Abortion](#)

### Get Involved

- [Plan C Community](#)
- [Take Action](#)
- [Stickers & Flyers](#)
- [Plan C Merch](#)
- [Social Media Toolkit](#)
- [Partner with Us](#)
- [For Medical Professionals](#)
- [Work with Plan C](#)
- [Donate](#)

### About Plan C

- [Mission](#)
- [Team](#)
- [Press](#)
- [Research & Learning](#)
- [PLAN C: The Documentary](#)
- [2023 Annual Report](#)
- [Media inquiries](#)
- [Contact Us](#)

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#)[Español](#)Site by [Eyes Open](#)

**Disclaimer:** This is not legal or medical advice and does not substitute for the representation of an attorney or the advice of a doctor. No attorney client relationship has been formed by reviewing this material.

**Abortion Care Network**

## **EXHIBIT 68**

**Abortion Shield Laws: A New War Between the States -  
NYT**

# Abortion Shield Laws: A New War Between the States

Doctors in six states where abortion is legal are using new laws to send abortion pills to tens of thousands of women in states where it is illegal.



By Pam Belluck

Pam Belluck spent time with abortion providers sending pills to states that outlaw abortion and talked with patients receiving those pills.

Published Feb. 22, 2024 Updated Feb. 23, 2024

Behind an unmarked door in a boxy brick building outside Boston, a quiet rebellion is taking place. Here, in a 7-by-12-foot room, abortion is being made available to thousands of women in states where it is illegal.

The patients do not have to travel here to terminate their pregnancies, and they do not have to wait weeks to receive abortion medication from overseas.

Instead, they are obtaining abortion pills prescribed by licensed Massachusetts providers, packaged in the little room and mailed from a nearby post office, arriving days later in Texas, Missouri and other states where abortion is largely outlawed.

This service and others like it are operating under novel laws enacted in a half-dozen states — Massachusetts, Washington, Colorado, Vermont, New York and California — that have sought to preserve abortion access since the Supreme Court overturned the nationwide right to abortion in June 2022. The laws have been in use only since the summer and have not been tested in the courts, but they are already providing abortion access to tens of thousands of women in states with bans, especially low-income patients and others who cannot travel.

Called telemedicine abortion shield laws, they promise to protect doctors, nurse practitioners and midwives licensed in those six states who prescribe and send abortion pills to patients in the nearly two dozen states that ban or sharply restrict abortion.

The laws stipulate that officials and agencies of their states will not cooperate with another state's efforts to investigate or penalize such providers — a stark departure from typical interstate practices of extraditing, honoring subpoenas and sharing information, legal experts on both sides of the abortion issue say. Many expect them to ultimately be challenged in federal court.

Abortion opponents see the laws as brazen infringement on state sovereignty.

Case 2:22-cv-00223-Z Document 217-5 Filed 01/16/25 Page 54 of 219 PageID 13522  
“You have states not just picking their own strategy but really trying to completely sabotage the governing efforts of their neighboring states,” John Seago, the president of Texas Right to Life, said.

“It can’t stand, and we can’t be content with this new development,” he added.



“Some people who might not have gotten an abortion if they had to take off work and go to a clinic, or wait three weeks and all of that, are doing it now,” said Dr. Linda Prine, a New York shield-law provider. Ilvy Njiokiktjien for The New York Times

The threat of shield laws is one reason that three states — Idaho, Kansas and Missouri — petitioned to join a case the Supreme Court will hear next month that seeks to bar the mailing of abortion pills and to require in-person doctor visits instead of telemedicine. The petition was denied.

App. 001076

"When you have states actively seeking to circumvent each other's laws, that raises a very real legal problem that will stretch far beyond just the abortion sphere," said Will Scharf, a Republican candidate for attorney general in Missouri, who helped draft anti-abortion legislation when serving as policy director for the state's governor six years ago.

Pills have become the most common abortion method nationally, and abortion rights advocates consider shield laws a crucial way to counter the wave of bans enacted since the Supreme Court's decision in Dobbs v. Jackson Women's Health Organization.

"This might be the most important event since Dobbs on so many levels," said Rachel Rebouché, the dean of Temple University Law School, who has worked with shield law advocates and legislators. "Thousands and thousands of pills are being shipped everywhere across the United States from a handful of providers. That alone speaks to the nature of what mailed medication abortion can do."

Before shield laws were enacted, Aid Access, one of the organizations in the forefront of telemedicine abortion, served patients in states with bans by issuing prescriptions from Europe and shipping pills from a pharmacy in India. Pills could take weeks to arrive, potentially putting patients beyond 12 weeks' gestation, the recommended threshold for taking the medication.

With shield laws, "some people who might not have gotten an abortion if they had to take off work and go to a clinic, or wait three weeks and all of that, are doing it now," said Dr. Linda Prine, a New York shield law provider.

Aid Access providers are now using shield laws to serve about 7,000 patients a month, nearly 90 percent of them in states with bans or severe restrictions, according to Dr. Abigail Aiken, an associate professor at the University of Texas at Austin, who studies Aid Access data.

The shield laws upend the usual telemedicine model, under which out-of-state health providers must be licensed in the states where patients are located.

Beyond providing abortion access to individual patients, the shield-law movement carries broader implications for abortion politics, and supporters are working to enact similar laws in as many states as possible so the approach becomes commonplace, according to Francine Coeytaux, a co-founder of Plan C, a clearinghouse for medication abortion information.

"The shield laws are about a state's legislative and justice system having skin in the game," she said.

## Inside the room



Telemedicine abortion shield laws are intended to protect doctors, nurse practitioners and midwives who prescribe and send abortion pills to patients in the nearly two dozen states that ban or sharply restrict abortion. Sophie Park for The New York Times

Carol, who asked to be identified by her middle name to help keep her role private, met me behind the brick building outside Boston and escorted me through a back door, down a warren of hallways. Others who rent offices in the building haven't asked what she does there, she said, adding: "I'm kind of hoping that most people aren't really that curious about what's going on."

At a plain white table, Carol, who has a master's degree in public health, began her routine: checking a spreadsheet of prescriptions; printing out labels with medication information and patients' names; printing address labels with tracking numbers and adding them to the

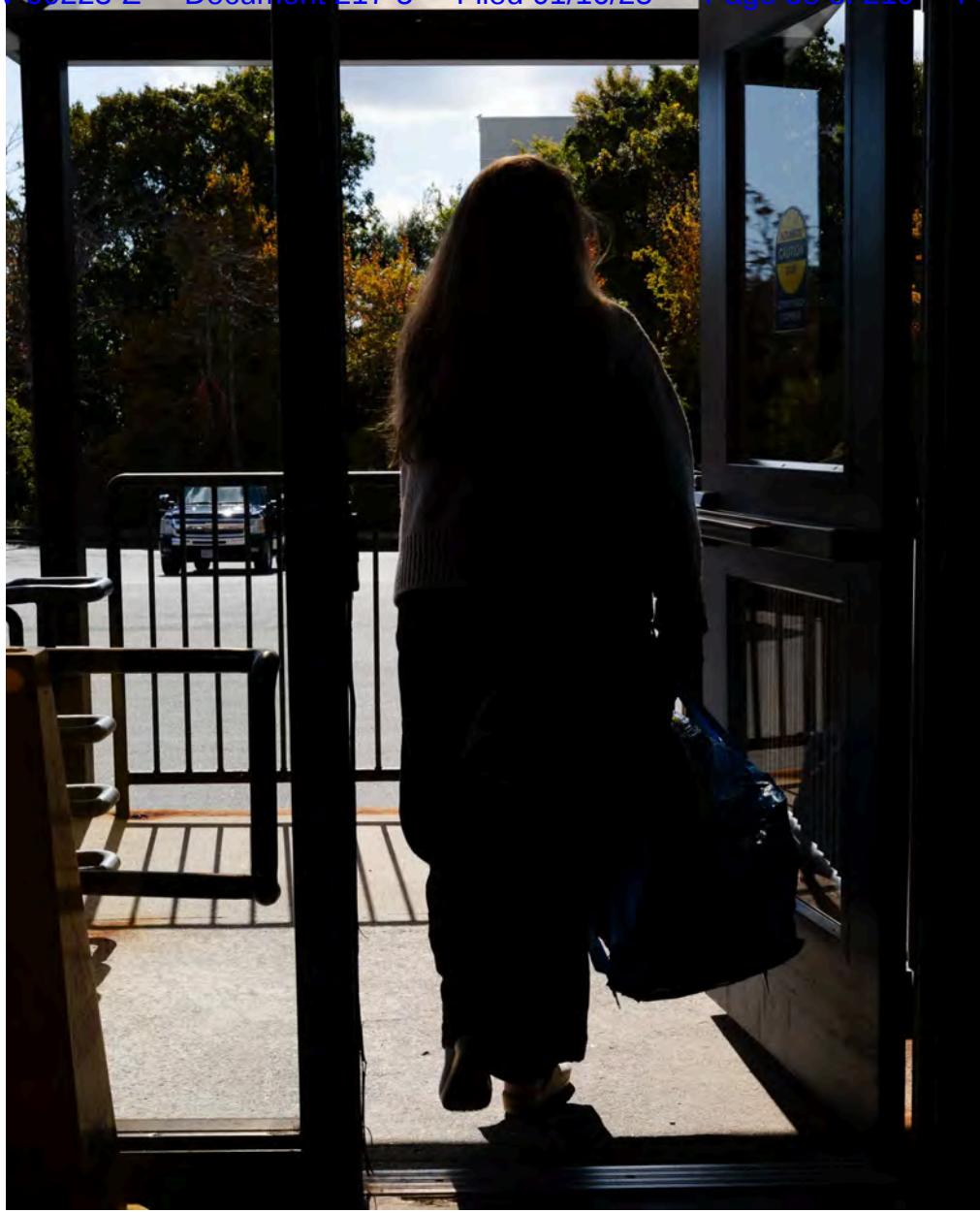
App. 001078

Patients contact this service and others online and fill out forms providing information about their pregnancy and medical history. Carol's colleague, Lauren Jacobson, a nurse practitioner, writes prescriptions, evaluating whether patients are medically eligible. They can be up to 12 weeks pregnant and must have no disqualifying medical issues like an ectopic pregnancy or a blood-clotting disorder. Patients and providers can communicate by email or phone if needed.

"We're a free country," said Ms. Jacobson, who sometimes writes 50 prescriptions a day. "So let's put that to the test. Here we are and we're not going to be intimidated, and we have our states backing us."

Carol pulled the two abortion medications from storage boxes: mifepristone, which stops a pregnancy from developing, and misoprostol, taken 24 to 48 hours later to spur contractions to expel pregnancy tissue.

"I don't really consider myself a rule breaker," she said. "So it's funny that here I am sitting in this tiny little closet surrounded by pill bottles."



Carol and others who use shield laws to send abortion pills to patients are taking precautions to protect themselves, including not traveling to states with abortion bans, where they could be more vulnerable to arrest. Sophie Park for The New York Times

The operation resembles a small-scale assembly line, preparing medication for six packages at a time: one mifepristone pill in a manufacturer's prepackaged box and 12 misoprostol tablets counted out by hand from bottles of 100 supplied by a wholesaler. Carol slid the medications into plain envelopes lined with bubble wrapping, along with a 10-page pamphlet from the mifepristone manufacturer and illustrated instructions from Aid Access about taking the medication and expected side effects, like cramping and bleeding.

She drove several miles to a post office to mail the envelopes.

"Getting ready for Christmas?" another customer in the post office asked one day, she recalled.

Case 2:22-cv-00223-Z Document 217-5 Filed 01/16/25 Page 59 of 219 PageID 13527  
“Surprise, I’m actually Santa Claus,” she replied cheerfully.

One of Carol’s envelopes arrived at the home of Ashley Dickey in Texas.

Ms. Dickey has two young children and said she had experienced serious postpartum depression after those pregnancies. She said she dissolved in tears when she became pregnant again and concluded that she could not manage another pregnancy and raise another child. “It’s just not good for anybody,” she said.

When she learned she could receive pills by mail, “I was so grateful,” she said, adding, “If I would have had to travel somewhere, it would have been catastrophic, financially and then just emotionally.”



“If I would have had to travel somewhere, it would have been catastrophic, financially and then just emotionally,” said Ashley Dickey, a Texas patient who received abortion

App. 001081

## Reaching low-income patients

Supporters say shield laws are already making substantial progress toward an important goal: helping patients who cannot afford — financially or logistically — to travel to another state for an abortion.

“It’s reaching the ones that were impacted the most: low-income, poor people, communities of color, Indigenous,” said Michelle Colón, the executive director of SHERo Mississippi, an organization supporting reproductive rights for people of color.

Nationally, there are three main providers: Aid Access; the Massachusetts Medication Abortion Access Project (called The MAP); and a service called Abuzz, which does not yet serve all states with abortion bans. They charge \$150 or \$250, though all three services provide pills for reduced prices or even at no cost, based solely on what patients say they can pay.

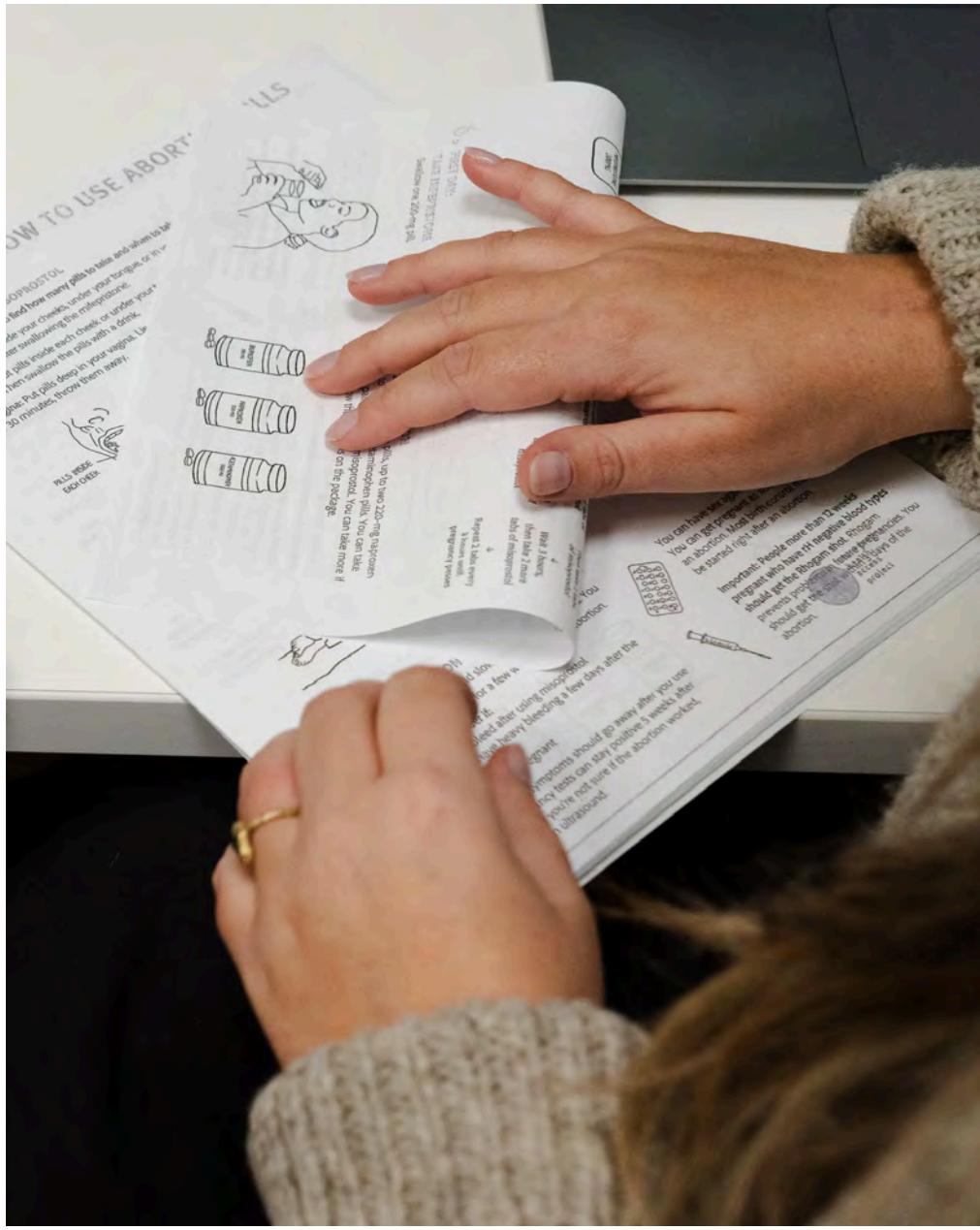
Dr. Rebecca Gomperts, a Dutch physician who founded Aid Access, said over half of its shield-law patients cannot pay full price. About a third of The MAP’s patients can afford only the service’s \$5 minimum, said Dr. Angel M. Foster, director of The MAP.

But shield-law providers say it is uncertain whether they can sustain their pay-what-you-can approach. Most providers are absorbing the cost for thousands of patients who can’t pay full price. So far, most abortion funds — organizations that provide financing to help patients obtain abortions — have not given money for sending pills to anti-abortion states, partly because they do not know if shield laws would protect the funds.

“I’ve had several funds say, ‘Our lawyers say we cannot do this,’” said Susan Yanow, a longtime reproductive health activist working with The MAP, who has nonetheless gotten some funds to contribute.

A few funds openly support shield-law activity. “We are here to boldly make a statement,” said Karen Middleton, president of Cobalt Abortion Fund in Colorado, which gives \$2,500 a month to that state’s provider. And some advocates are starting funds, including Jodi Jacobson, an activist based in California, who said she wanted to support “providers who are losing money” performing what she called “medical civil disobedience.”

## Legal strategizing



Authorities in states with abortion bans have not yet tried to prosecute, sue or otherwise target shield law providers, but some advocates on both sides say it is only a matter of time before that happens. Sophie Park for The New York Times

Several Republican attorneys general from states with strict abortion prohibitions declined requests to discuss shield laws. But Mr. Scharf, who is challenging Missouri's incumbent attorney general in the Republican primary, predicted that the shield laws would almost certainly be challenged in court.

"Constitutional litigation is obviously an option here," he said. "Ultimately, whenever you get attempts like this to circumvent our constitutional system of federalism, that's going to be something that's litigated."

App. 001083

Dr. Seago of Texas Right to Life said taking action against shield-law providers would be “a difficult challenge” that would require “the right case,” including a patient “on the receiving side of those illegal activities” who would cooperate with a civil suit or prosecution.

“We can definitely promise that in a pro-life state like Texas with committed elected officials and an attorney general and district attorneys who want to uphold our prolife laws, this is not something that’s going to be ignored for long,” he said.

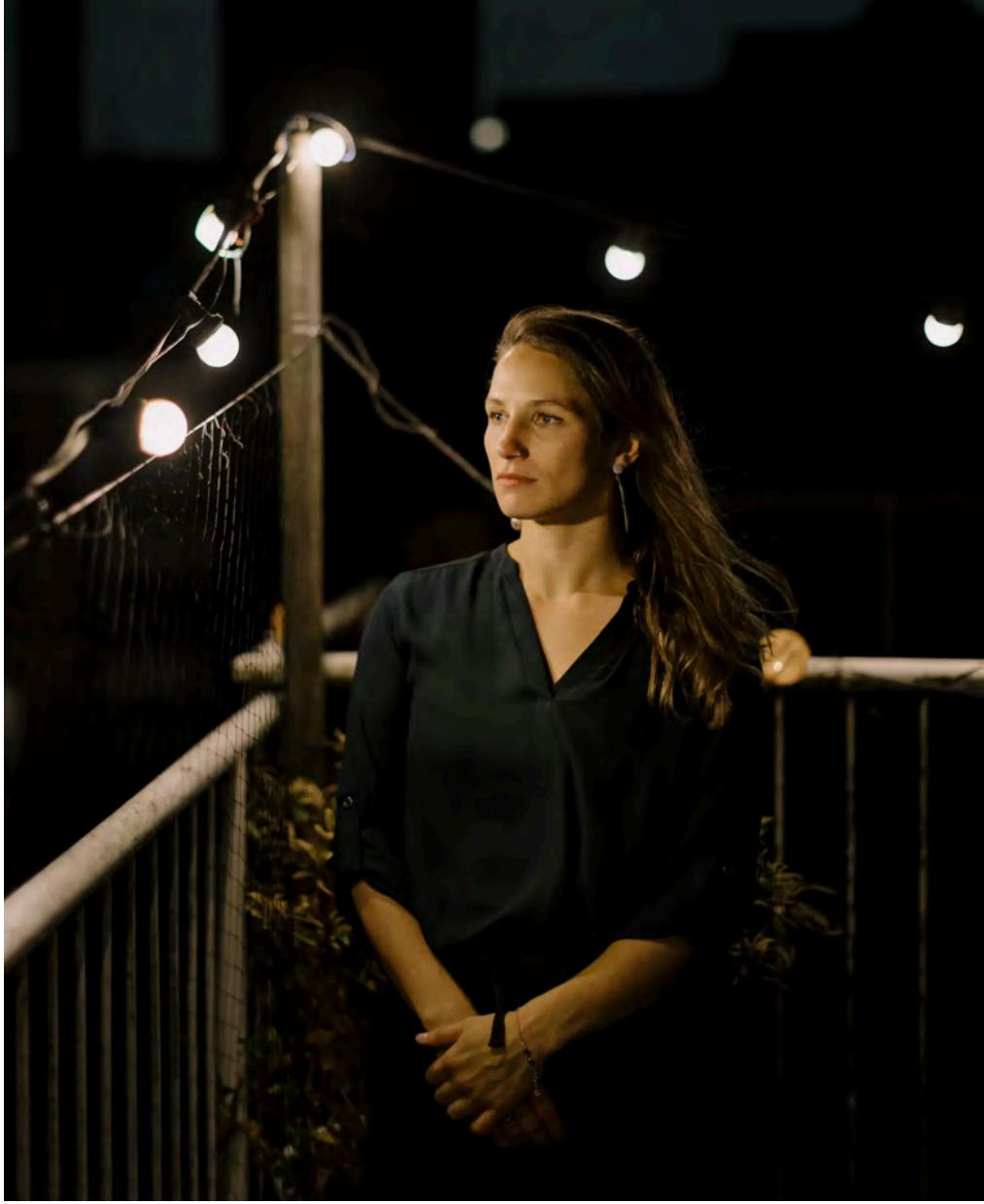
Many shield-law providers are taking precautions, including not traveling to states with abortion bans, where they could be more vulnerable to arrest. Some are not sending pills to states where they have family. Some are creating trusts to protect their assets from civil suits.

“At any moment, I might get a cease-and-desist order, or I might get a lawsuit, or I might get some district attorney coming after me, I have no idea,” said Dr. David Wiebe, who operates under Colorado’s shield law. “I’m absolutely flying out at full risk here.”

The MAP has taken several protective steps. All of its prescribers are within Massachusetts. Pills are stocked and packaged at a separate location by workers hired by Cambridge Reproductive Health Consultants, a nonprofit Dr. Foster leads. “Our model is about distributing risk,” she said.

One national mail-order pharmacy, Honeybee Health, based in California, is evaluating whether it can send pills to states with abortion bans under California’s shield law, a step that would allow providers in any shield-law state to send their prescriptions to Honeybee and avoid stocking and shipping pills themselves.

Honeybee’s co-founder and president, Jessica Nouhavandi, said she hoped to do so, but worried about jeopardizing her business, which dispenses other medications too. If an anti-abortion state like South Carolina pulled her license, “what happens to my thousands of South Carolina patients who get their blood thinners from me?” she said.



“We’re a free country,” said Lauren Jacobson, a nurse practitioner who sometimes writes 50 prescriptions a day. “So let’s put that to test. Here we are and we’re not going to be intimidated, and we have our states backing us.” Ilvy Njiokiktjien for The New York Times

Another unknown is the outcome of the lawsuit by abortion opponents seeking to curtail mifepristone. An appeals court ruling effectively barred the mailing of mifepristone and required in-person doctor visits. The case is now before the Supreme Court.

“If we prevail on that, all these shield laws will be rendered moot at that point because then there’ll be a federal policy prohibiting such a transaction,” said Erik Baptist, senior counsel for the Alliance Defending Freedom, which represents abortion opponents in that case. Some shield law providers say they will look for legal ways to continue.

Texas, which has strict bans, is home to about a third of shield-law patients, including Elizabeth, who asked to be identified by her middle name to protect her privacy. She considered traveling to California, where a friend lives, but medication abortion at a clinic there would cost \$750, plus transportation expenses.

She was relieved to find Aid Access and to receive pills mailed from Massachusetts. Although abortion bans target providers and not patients, she said she was still nervous about people in Texas finding out.

“That’s been very scary,” she said, “but I was like, you know what, I have to trust it.”

Weeks later, Elizabeth said she planned to visit a doctor for birth control, but worried about being asked if she’d taken abortion pills.

Ms. Jacobson, who prescribed her the medication under Massachusetts’ shield law, reassured her, noting that there was no medical reason to disclose having taken abortion pills.

“The symptoms that the abortion pills cause are exactly the same as those that a miscarriage causes, so there is no possible way for a provider, a doctor, to look at you, do any test and know that you took the pills,” she said, adding, “We’ve helped a lot of people navigate situations in places like Texas.”

**Pam Belluck** is a health and science reporter, covering a range of subjects, including reproductive health, long Covid, brain science, neurological disorders, mental health and genetics. More about Pam Belluck

---

A version of this article appears in print on , Section A, Page 1 of the New York edition with the headline: New Shield Laws Allowing Women Abortion Access

## **EXHIBIT 69**

### **MAP Frequently asked questions**

← → ⌂ cambridgereproductivehealthconsultants.org/map

- Finally, you will take 4 more misoprostol pills. You will take these pills 4 hours after you take the first set of misoprostol pills. This helps ensure that the abortion is complete.

We will provide you with detailed instructions about what to do and what to expect when we send the medications.

## Frequently asked questions

Taking the first pill (mifepristone)   Taking the second pills (misoprostol)   Side effects   What to expect after the abortion

If you need care

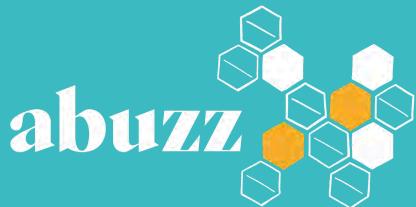
I am worried that I'm still pregnant. How can I check? ▾

I am worried that something went wrong with the abortion. What do I do? ^

Most abortions are successful. People only need some kind of help, like a suction procedure or more medication, in about 2 in 100 cases. However, if you are worried, you can get an ultrasound at an emergency department or through a primary care doctor or gynecologist. If you do not feel safe telling them you used abortion pills, tell them you are pregnant and had some bleeding and want to know if everything is OK.

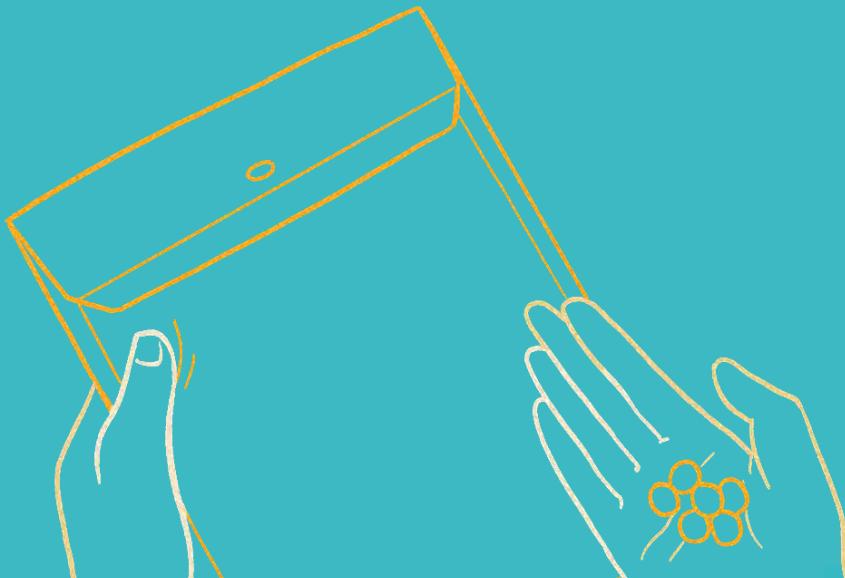
## **EXHIBIT 70**

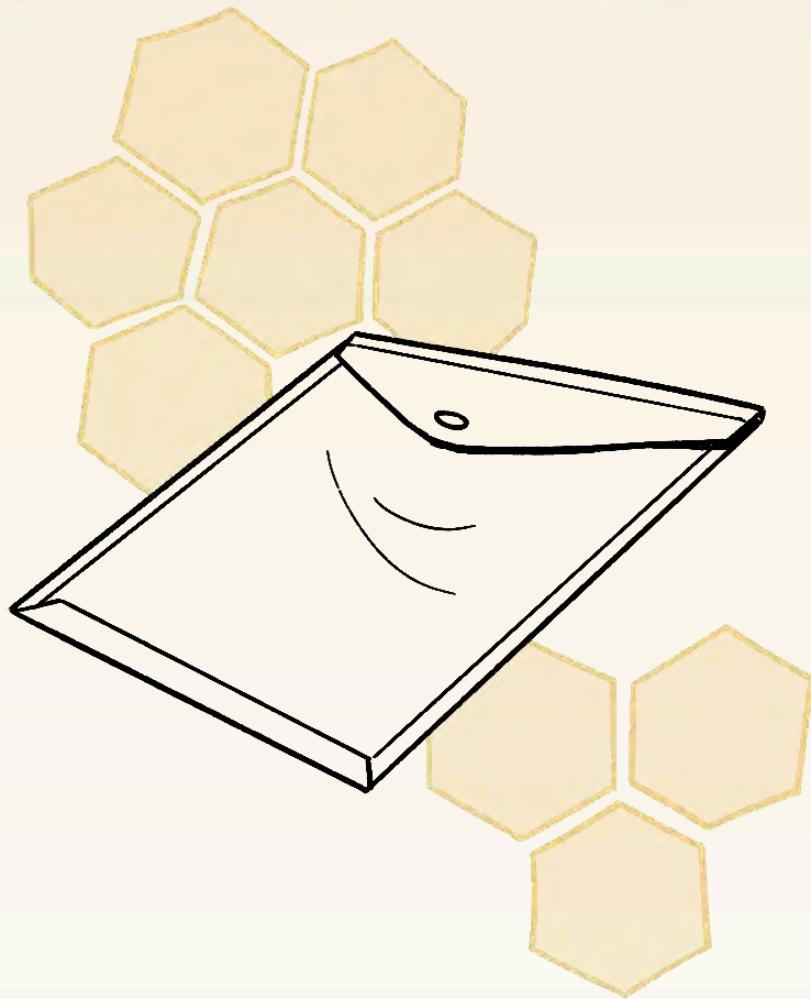
**Need Abortion care at home?  
abuzz**



# Need abortion care at home?

Get access today



**Fast, discreet shipping.**

Packages arrive in 2-5 days. Medications are shipped in a plain mailing envelope.

**Affordable care for everyone.**

Accessing safe and affordable healthcare is a fundamental right. Services are available for \$0-150 sliding scale.



**The support you need, when you need it.**

An experienced medical team is here to answer your questions, provide support, and guide you through the process.

**Abuzz may be able to help  
you if...**



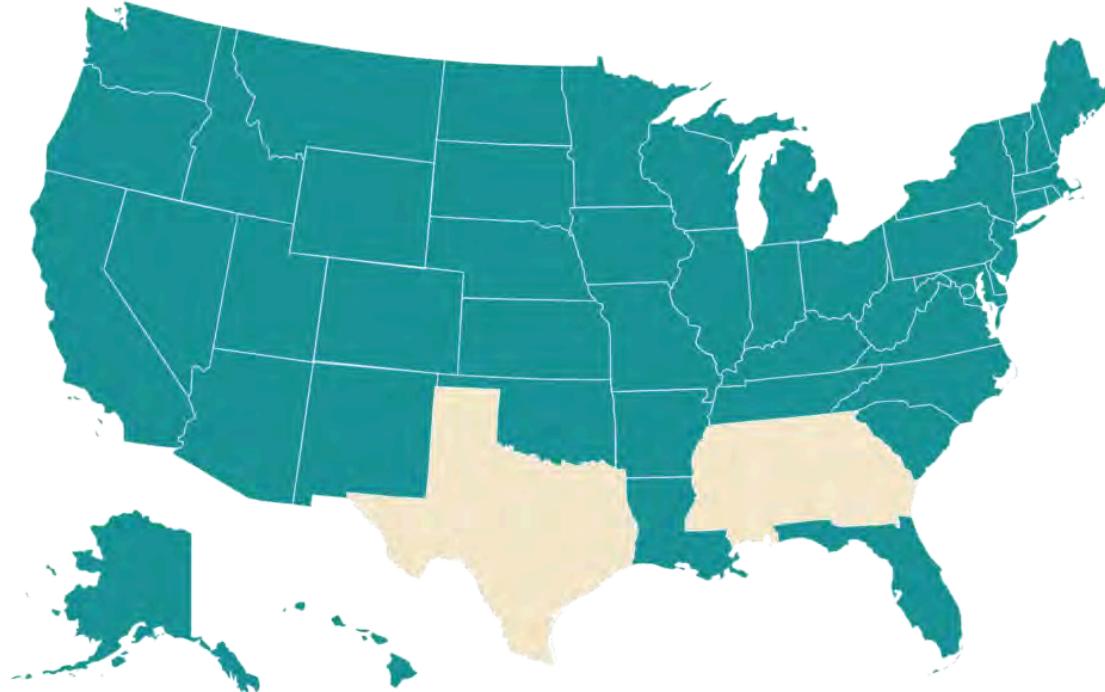
## You're less than 13 weeks pregnant.

You must be less than 13 weeks pregnant to access abortion through Abuzz. Remember that pregnancy is measured from the first day of your last menstrual period, which is around two weeks before conception.

→ How do I estimate the length of my pregnancy?

## You're comfortable with virtual abortion care.

In most cases, providers do not require a phone call or video visit. After you fill in the form, a clinician will arrange payment with you and review your information. If you're approved to receive abortion pills by mail, your pills will be shipped out in 1-2 business days.



## You have a mailing address in one of our states.

Options for at-home abortion pill access will vary based on your location. Click below to find options in your state or territory.

**Still have questions? Check out our FAQ**

[→ Go to the FAQ](#)

# abuzz



Abuzz: Abortion Pill Access At Home

About Us

How it Works

FAQ

Terms of Use

Privacy Policy

Provider Payments

**Donations allow us to help all pregnant people, regardless of their ability to pay. Please consider supporting our work.**

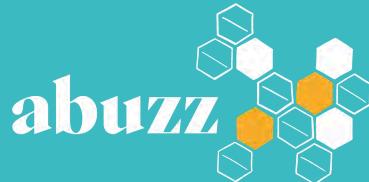
[DONATE](#)

---

© Abuzz LLC 2023

## **EXHIBIT 71**

### **FAQ - Abuzz**



## Frequently Asked Questions\*

[Services](#)[About Abortion Pills](#)[Before Taking Abortion Pills](#)[How to Use Abortion Pills](#)[During An Abortion With Pills](#)[After An Abortion With Pills](#)

## Services

### I can't afford \$150. Can I still get help?



Yes, you can still get help! Just let your provider know what you can afford when you fill out the form.

### Can I get abortion pills even if I'm not pregnant?



Yes, clinicians offer abortion pills "just in case" you do get pregnant. These are sometimes called "advance provision" or "pills for future use."

### Do I have to have a video visit or phone call?



In most cases, a phone or video call is not required. Everything is done through the intake form. You will receive a phone number so that you can contact the medical team for any follow up questions. We are here to support you if you choose.

### What happens after I fill out the form?



We will connect you with a provider that is best suited to support your care. The provider will arrange payment with you and review your file. They might ask you some follow up questions. If you are eligible to receive services, they will mail you abortion pills.

### How do I get started?



Fill in the form [here](#).

# About abortion with pills

## What comes in the abortion pill kit?

The abortion pill kit has two medicines: mifepristone and misoprostol. The combination of mifepristone and misoprostol is very effective and has the fewest side effects.

## How do the abortion pills work?

Mifepristone stops the pregnancy from growing. Misoprostol makes the uterus contract and push out the pregnancy just like a natural miscarriage.

## How effective are abortion pills?

The combination of mifepristone and misoprostol has been shown to be 98% effective at ending a pregnancy.

## Is there a difference between the generic (mifepristone) and brand (Mifeprex) versions of mifepristone?

There is no difference between them.

## Are abortion pills safe?

They are very safe – safer than Tylenol and safer than driving in a car! The risk of severe, life-threatening complications requiring hospitalization is less than 1%.

## If abortion pills are so safe, why are they so restricted?

Restrictions on abortion pills have nothing to do with medical safety or effectiveness. The restrictions are made by politicians who are against abortion.

## Will the abortion pills affect my ability to get pregnant in the future?

No, abortion pills do not affect your future fertility. You can still get pregnant again.

App. 001099

**I have an Rh negative blood type. Will I need Rhogam if I am less than 12 weeks when I take the abortion pills?**

No, Rhogam is only needed for people with Rh negative blood after 12 weeks.

**Do abortion pills increase the risk of infection?**

Infections from abortions are very rare. They occur in less than 2% of all abortions and usually are easily treated with antibiotics when they do occur.

**How far in pregnancy can I use abortion pills?**

The clinicians we refer to will send the pills to people up to 12 weeks and 6 days pregnant. If you are 13 weeks pregnant or more, you can find services here.

**What is an ectopic pregnancy and how would I know if I had one?**

Ectopic (tubal) pregnancies are located outside of the uterus. The risk of having an ectopic pregnancy is very low (less than 2%), but if it bursts it is a medical emergency. The only way to know for sure if you have an ectopic pregnancy is by ultrasound. If you are pregnant and have any of the following signs of a ruptured ectopic pregnancy, you should go to the hospital right away: severe abdominal pain on one side, dizziness, lightheadedness, feeling very weak. There is a higher risk of ectopic pregnancy if you have an IUD or history of ectopic pregnancies.

**Will the pills work if I have an ectopic pregnancy?**

The abortion pills will NOT work for an ectopic pregnancy. If you take abortion pills and do not have any bleeding within 24 hours after taking misoprostol, you should speak to your abortion pill provider right away. They may recommend an ultrasound to check the location of the pregnancy.

**Can I use abortion pills if I have an IUD in place?**

It is very rare to become pregnant with an IUD in place. If you are pregnant with an IUD, there is a higher risk of it being an ectopic pregnancy. Ectopic pregnancies are dangerous because they can burst suddenly and cause severe internal bleeding. While an ultrasound is not required, it would show the location of the pregnancy and the IUD. You don't need to have the IUD taken out before taking abortion pills. They will still work (unless it is an ectopic pregnancy) and a risk is that the IUD may come out with the pregnancy. Since you have become pregnant, it also means you will need to have the IUD replaced after the abortion since it is no longer working correctly.

**I got an abortion pill kit for future use. How long is it good for?**

You can store the pills for at least two years (and probably longer) in a cool, dry, dark place. It's not recommended to store them in the bathroom because the heat and humidity can make the pills less

App. 001100

**Can I receive just misoprostol?**

Using mifepristone and misoprostol together is considered the “gold standard” protocol for abortion with pills. Typically, clinicians prefer to prescribe the two medications together as they have fewer side effects and the process is easier. If you cannot take or do not want to take mifepristone, you can fill in the online form and ask your clinician about a misoprostol-only abortion.

**Can I fill an abortion pill prescription at my local pharmacy?**

Local pharmacies in the U.S. are allowed to dispense mifepristone after getting certified. You can locate a pharmacy [here](#). Some clinicians may be able to send a prescription for you to fill at a local pharmacy. At this time, Abuzz does not offer this service.

## Before taking abortion pills

**What should I do before taking abortion pills?**

Before taking pills, it is helpful to do a pregnancy test to confirm you’re pregnant. This avoids taking pills unnecessarily and prevents confusion. If you don’t want to take a pregnancy test, you don’t have to. You should also estimate how far along the pregnancy is. Pregnancies are measured starting from the first day of your last period (and not from conception or when you had sex). You can figure out how far along the pregnancy is using your last period in a [pregnancy calculator like this one](#) or by getting an ultrasound.

**What kind of pregnancy test should I use before taking the pills?**

Almost any pregnancy test will work. Dollar store tests work great. We do not recommend using any digital (positive/negative or +/-) pregnancy tests because we have noticed many people having false positives (a positive test result when they are not actually pregnant).

**Do I need to get an ultrasound before taking abortion pills?**

No, getting an ultrasound is not required for most people. You do not need to get an ultrasound as long as your provider can figure out how far along your pregnancy is and you do not have signs of an ectopic pregnancy.

**How should I get ready to take my abortion pills?**

1. Read our information on how to take the pills, what you might see and feel, and how to identify signs of complications.
2. Have a plan for where and when you will take the pills. You will want to be in a comfortable place and have access to a bathroom for up to 12 hours after taking misoprostol (the second medicine).
3. Have a plan for how to get emergency medical care in the unlikely event that you need it. It can be good to have a support person (in-person or [virtually](#)) in case you need help – especially the day you take misoprostol because this is when you'll have the most cramping/pain and bleeding.
4. Have on hand whatever you usually use to help with your periods (ex: large overnight pads, painkillers, anti-nausea medicine, heating pads, comfortable clothes, snacks, netflix/movies, etc).

## How to use abortion pills

### How should I take the abortion pills?

Check out the [instructions](#). How you take the abortion pills depends on how far along the pregnancy is. You can figure out how far along the pregnancy is based on your last period or by getting an ultrasound. There are many different ways to take the pills and most work well. The [World Health Organization](#) recommends:

Less than 9 weeks	<ul style="list-style-type: none"><li>• Swallow 1 mifepristone 200mg pill orally</li><li>• Wait 1-2 days</li><li>• Take 4 misoprostol 200mcg pills under the tongue, in the cheek, or in the vagina. If you don't start bleeding after 24 hours, take another 4 pills.</li></ul>
9-11 weeks	<ul style="list-style-type: none"><li>• Swallow 1 mifepristone 200mg pill orally</li><li>• Wait 1-2 days</li><li>• Take 4 misoprostol 200mcg pills under the tongue, in the cheek, or in the vagina. 4 hours later, take another 4 misoprostol 200mcg pills.</li></ul>
12+ weeks	<ul style="list-style-type: none"><li>• Swallow 1 mifepristone 200mg pill orally</li><li>• Wait 1-2 days</li><li>• Take 2 misoprostol 200mcg pills under the tongue, in the cheek, or in the vagina every 3 hours until the pregnancy tissue is out.</li></ul>

### How long do I have to wait to take misoprostol (the second medicine)?

We recommend taking misoprostol 1-2 days (24-48 hours) after mifepristone because this will be the most effective.

### How do I take misoprostol (the second medicine)?

Misoprostol can be taken in 3 different ways – vaginally, buccally, or sublingually. Vaginally means inserting the medicine with your fingers into the vagina. Buccally means holding the medicine in your cheeks like how a chipmunk holds food. Sublingually means holding the medicine under your tongue. If you take the misoprostol sublingually or buccally, after 30 minutes you can swallow whatever remains of the pills.

#### What is the difference between putting the misoprostol (the second medicine) under your tongue, in your cheek, or in the vagina?

In areas where abortion is restricted, it can be safer to put the misoprostol in your cheek or under your tongue. After 30 minutes you can swallow or spit out anything that is left. Using the medicines in your cheeks or under your tongue can give you more side effects (nausea, vomiting, diarrhea). Using the medicines in the vagina gives you less side effects, but the pills could be seen during a vaginal exam. If this is a concern for you, we recommend that you use the pills in your cheek or under your tongue.

#### What can I take for nausea?

You can take over the counter anti-nausea medicine like Unisom or Dramamine. Other things that can help with nausea include ginger tea, chewing gum, and sucking on hard candies. A prescription for anti-nausea medication can be sent if needed.

#### What can I take for pain?

1. It's most effective to wait until you feel some pain before taking painkillers (but do not wait until the pain is unbearable). You can take over-the-counter painkillers like ibuprofen (Motrin/Advil) and acetaminophen (Tylenol). You can take 600-800mg ibuprofen every 6-8 hours with food. You can take 1000mg of acetaminophen every 6 hours. You can also take ibuprofen and acetaminophen together. If you do not want to use ibuprofen, you can try taking naproxen (Aleve) 550mg every 12 hours. To be more comfortable during the process, you can also try using a hot water bottle or heating pad on the belly, listening to music, having a support person, being someplace private, etc.

#### Why do I start with fewer misoprostol pills when I'm 12+ weeks pregnant?

The farther along you are, the fewer misoprostol pills you need for each dose. After 12 weeks, people should take 1 mifepristone followed by 2 misoprostol pills repeated every 3 hours until the pregnancy passes.

#### Why do I have extra pills and what should I do with them?

Extra misoprostol pills are sent in case:

1. You vomit after taking the pills
2. You don't bleed enough after taking the pills
3. You have too much bleeding after taking the pills

Please keep any extra misoprostol for at least 2 months. This way you will have it on hand in case you experience a complication and are advised to take it.

App. 001103

**What do I do with my extra pills?**

Please keep any extra misoprostol for at least 2 months. This way you will have it on hand in case you experience a complication and are advised to take it.

**What if I throw up after taking the abortion pills?**

As long as you can keep the mifepristone (first medicine) down for at least 30 minutes, it will most likely be effective. If you vomit less than 30 minutes after taking mifepristone, it might not be as effective, so contact us for further information.

As long as you keep the misoprostol (second medicine) in your mouth for at least 20 minutes, that should be enough time for the medication to absorb and be effective. If you vomit less than 20 minutes after taking the misoprostol by mouth, it's recommended to take anti-nausea medication, wait a few hours, and try again.

## During an abortion with pills

**What happens after taking the abortion pills?**

Most people don't have any symptoms after taking mifepristone (the first medicine). Some people might have light bleeding or nausea. The main symptoms of bleeding and cramping usually begin after taking the misoprostol (the second medicine).

**How much bleeding and cramping will I have?**

Every person is different, and there is a range of normal bleeding and cramping.. Most people have bleeding and cramping that is heavier than a period and can include blood clots the size of lemons. Some people only have light bleeding. It usually starts 4-6 hours after taking the misoprostol (the second medicine) and starts to slow down within 1 day. Some people have mild pain, and other people have very intense cramps.

**What if I start bleeding/having a miscarriage before I use the abortion pills?**

Signs of a miscarriage don't always mean you had a complete miscarriage so it is recommended that you still use the abortion pills to make sure the pregnancy passes fully.

**What are the side effects of misoprostol (the second medicine)?**

The side effects of misoprostol include nausea, vomiting, headache, diarrhea, fever, and chills. These are usually temporary and go away on their own. If the fever (more than 101 degrees) continues for more than 24 hours after taking misoprostol, please contact your abortion pill provider because this can be a sign of infection.

#### How much bleeding is too much?

It is normal to have heavy bleeding and blood clots. If you are soaking 2 large overnight pads per hour for 2 hours in a row (4 pads in 2 hours) that is too much bleeding. You should seek medical attention right away if this happens. Sometimes providers recommend taking 2 more misoprostol pills to slow the bleeding down while waiting for medical attention.

#### What are signs of a complication?

If you have very heavy bleeding (soaking 2 large overnight pads per hour for 2 hours in a row), fever for over 24 hours since taking misoprostol, or severe pain that is not relieved by painkillers, these are signs of severe medical complications, and you should seek medical attention right away.

#### Will anyone be able to tell that I took abortion pills?

No, there are no tests to detect that you took abortion pills by mouth. The only way for the providers to know is if you tell them or if you took the pills vaginally and they see them on an internal exam. You do not need to say that you took abortion pills.

#### If I have to go to the hospital, what should I say?

The treatment for a miscarriage and abortion are the same, so you can just say something like "I'm bleeding but it doesn't feel like my usual period. I'm afraid something is wrong" or "I'm pregnant and bleeding. I'm scared there's something wrong" and you should get the care you need.

## After an abortion with pills

#### How do I know if the abortion pills worked?

Most people can tell if the pills worked by what they experience and how they feel. Some signs that the abortion pills worked can include: bleeding (light or heavy), cramping after taking the pills, passing clots and/or tissue, and no longer feeling pregnant. Pregnancy tests can stay positive for up to 5 weeks after a successful abortion, so they are not reliable before that time. If you still feel pregnant, you should contact your abortion pill provider.

This could be a sign that the pills didn't work, so you need to talk to your abortion pill provider for further guidance.

#### How long will I bleed after taking abortion pills?

Bleeding should start to slow down after the pregnancy passes. However, light bleeding and/or spotting can continue off and on for up to 6 weeks. If you have been bleeding more than 6 weeks, contact your abortion pill provider.

#### What if I have vaginal odor after using the pills?

Your vagina needs time to adjust to the changing hormones after ending the pregnancy, so any odor changes can be normal. Burning or pain from the discharge are reasons to seek medical attention.

#### When can I get pregnant again after an abortion?

You can get pregnant as soon as 1 week after your abortion. If you want to prevent pregnancy, it is important to start birth control soon after your abortion.

#### When can I start birth control after my abortion?

You can start most methods right away. If you start within 1 week, you are protected from pregnancy right away. Here is a [guide](#) to starting birth control after an abortion.

#### When can I start exercising or return to work/school after an abortion with pills?

Everybody is different. Most people are able to return to normal activities the day after you finish taking misoprostol (the second medicine).

#### When can I have sex again after an abortion?

This is up to you and what feels right for your body. You can have sex again whenever you feel ready.

\* Nothing on this website is to be construed as medical advice. Please consult with a trusted healthcare professional before making any medical or healthcare decisions.

# abuzz



Abuzz: Abortion Pill Access At Home

[About Us](#)

[How it Works](#)

[FAQ](#)

[Terms of Use](#)

[Privacy Policy](#)

[Provider Payments](#)

**Donations allow us to help all pregnant people, regardless of their ability to pay. Please consider supporting our work.**

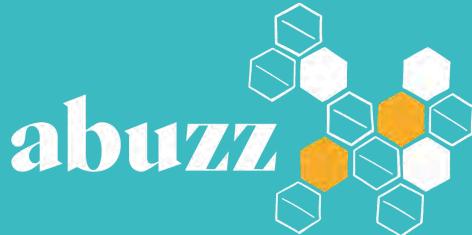
[DONATE](#)

---

© Abuzz LLC 2023

## **EXHIBIT 71a**

### **How It Works - Abuzz**

[X Quick Exit](#)

# How It Works

The process is simple, confidential, and designed to meet your needs.

## 1. Fill in the form.

The form asks a few basic questions to help the clinician know if you are eligible to get abortion pills by mail.

You will also be asked to upload a copy of your photo ID (if you do not have one, please let us know) and sign a consent form.

[Fill in the form →](#)

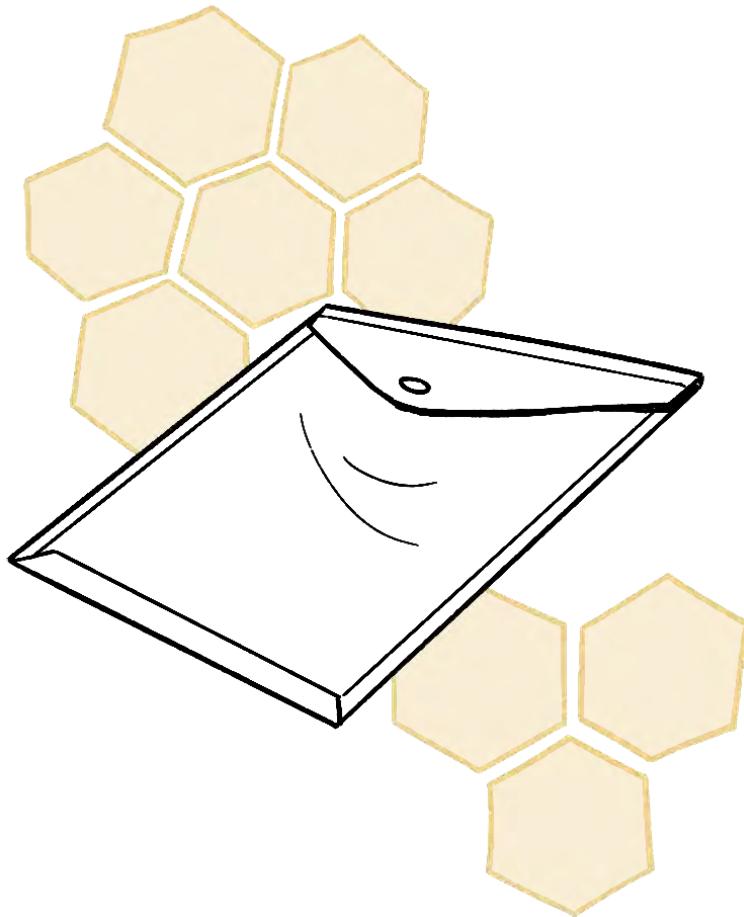
## 2. Check your email.

You'll get instructions for making a payment and signing into the secure portal. Follow those instructions to complete your request.

## 3. Review

A US-licensed clinician will review your eligibility for an at-home abortion with pills within 1-2 business days. In most cases, Abuzz providers do not require a phone/video call. If your provider has more questions, they will contact you via the portal.





## 4. Receive and use abortion pills at home

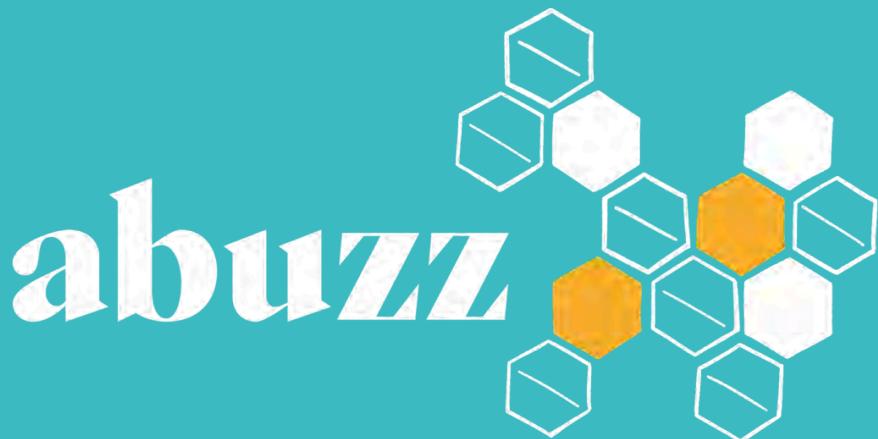
Your FDA-approved medications (mifepristone and misoprostol) will be sent by mail.

Shipping takes 1-5 business days. Detailed instructions and support are provided.

Clinicians are available to answer your questions 7 days a week.

# Still have questions? Check out our FAQ

→ Go to the FAQ



Abuzz: Abortion Pill Access At Home

About Us

How it Works

FAQ

Terms of Use

Privacy Policy

Provider Payments

**Donations allow us to help all pregnant people, regardless of their ability to pay. Please consider supporting our work.**

DONATE

© Abuzz LLC 2023

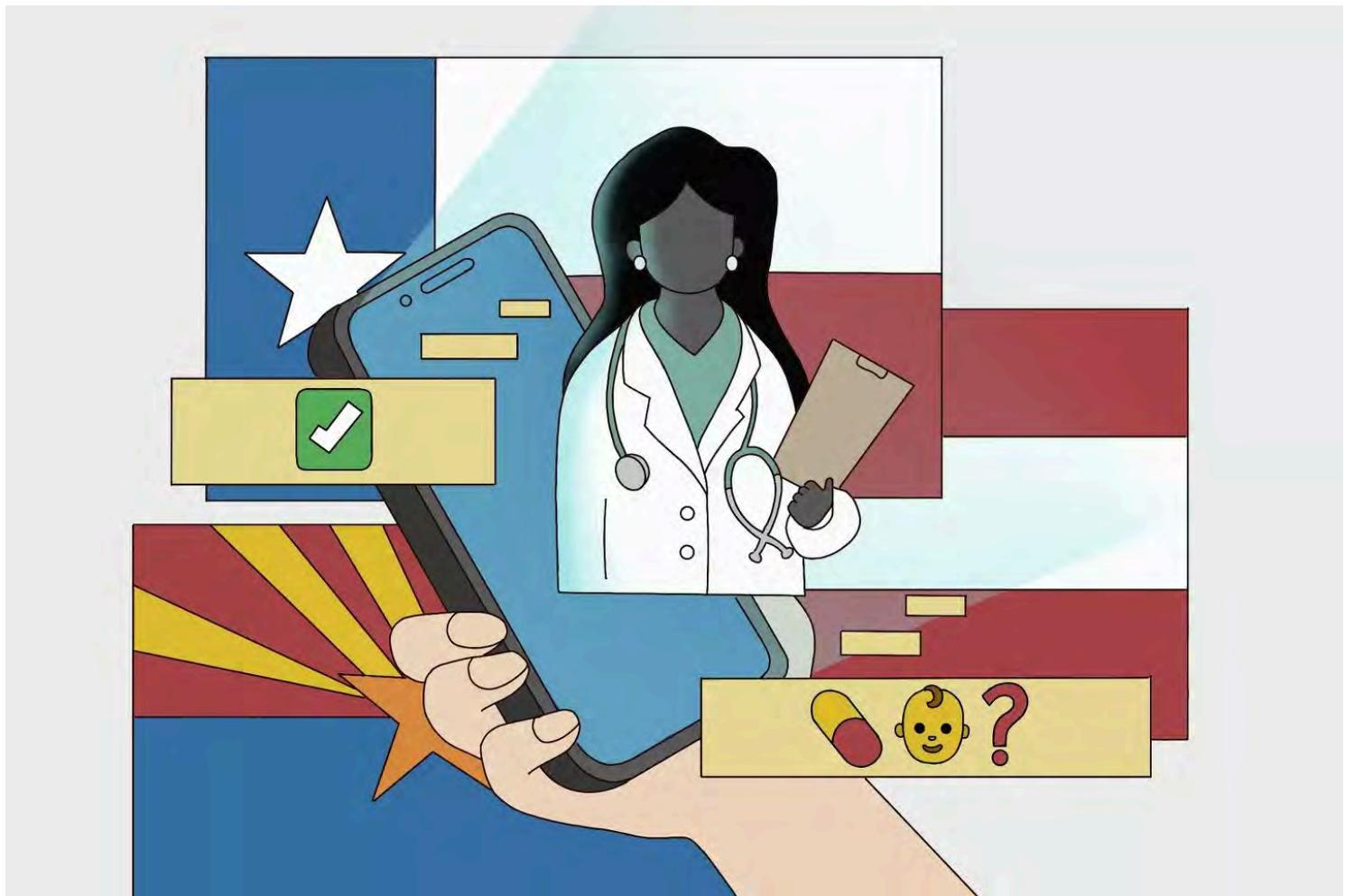
## **EXHIBIT 72**

**Thousands of out-of-state abortion seekers rely on two dozen doctors from telehealth shield states**

**POLITICS**

# Thousands of out-of-state abortion seekers rely on two dozen doctors from telehealth shield states

California only has two doctors to help out-of-state patients with telehealth abortions in a post-Roe landscape.



There are fewer than 25 telehealth providers prescribing medical abortions for those living in states that restrict or ban it.  
Stephanie Zhu / The Chronicle

By **Shira Stein**, Washington Correspondent

June 12, 2024

App. 001115



Like any other virtual visit, doctors in a handful of states log onto their computers, call patients and prescribe medication. Except their patients live in other states — and in some ways, another world.

The medical providers — fewer than two dozen of them, only two of whom live in California — prescribe medication abortions for people who live in states that restrict or ban it.

Telehealth abortions — in which abortion pills are sent by mail — have surged in the two years since the U.S. Supreme Court overturned Roe v. Wade. But the expanded availability of telehealth has obscured just how few providers are behind the climbing numbers.

---

**ADVERTISEMENT**

Article continues below this ad

---

Angel Foster, co-founder of the Massachusetts Medication Abortion Access Project, known as the MAP, said it took her organization a year to develop a practice that fully complies with state law.

[e-Edition](#)[Account](#)

~~practices to be able to provide from a specific state law start, Foster said.~~

They're doing so under new laws in seven states — California, Colorado, Maine, Massachusetts, New York, Vermont and Washington — that extend civil and criminal protections to clinicians providing telehealth abortions and bar state officials from cooperating with another state's investigation or prosecution of its abortion providers.

App. 001117

Providers and researchers say there are so few clinicians doing this work because the novel shield laws protecting telehealth abortions are untested, and because Planned Parenthood, the American Civil Liberties Union and other leading reproductive rights organizations privately opposed the laws' passage.

Telehealth abortion provision was opened up during the pandemic, when the Food and Drug Administration eased in-person dispensing requirements for mifepristone. The tension over the laws comes as abortion rights advocates seek to protect different forms of access to abortion in the wake of the U.S. Supreme Court's overturning of Roe v. Wade two years ago, and as the Supreme Court is set to decide whether to limit access to mifepristone, the first of two drugs used in a medication abortion.

---

**ADVERTISEMENT**

Article continues below this ad

---

Four telemedicine practices currently provide telehealth abortions to states with bans or restrictions — Abuzz, Aid Access, Armadillo Clinic and the Massachusetts Medication Abortion Access Project. The number of clinicians working for those practices or providing telehealth abortions is fewer than 25, several researchers and funders told the Chronicle.

Nearly 88,000 people received telemedicine abortions across the country in the second half of 2023, according to [WeCount](#), a nationwide study of abortion provision. Just under half were people in states with abortion bans or restrictions.

About 8,200 people in states with abortion bans or restrictions received a telemedicine abortion in December 2023, according to the most recently available data.

Loading...

For now, some of the newer practices have found ways to mitigate the risk of providing telehealth abortions to patients in states that restrict the procedure.

The Massachusetts Medication Abortion Access Project thought through details down to where its system servers are housed and where printed consent forms are stored, Foster said.

It also created a “distributed risk model, meaning that we’ve thought through how to either compartmentalize or separate components of our service to reduce the risk to any individual person,” Foster said. That includes ensuring the person who orders the medication, the person who prescribes it and the person who sends it to a patient are all different people.

The Abortion Coalition for Telemedicine shares best practices, provides pro bono legal advice and helps doctors set up electronic health records, evaluate malpractice insurance and assess their personal risks, said executive director Julie Kay.

Some providers have decided that while they are providing abortions into restricted states, they won't travel to those states or through them. For Foster, that means her mother and stepdad have to travel outside of South Carolina, where they live, to see her.

A big barrier for many of the clinicians is the cost. Most of the providers quote \$150 to \$250 per patient to cover the upfront cost of buying the pills, maintaining a privacy-compliant platform and electronic health record storage, and shipping the pills themselves in some cases, but will often take less if patients can't afford it.

Several groups have also begun assisting providers with the costs because some traditional abortion funds, which provide financial and logistical assistance to abortion-seekers, haven't done so, Kay said.

Groups that provide funding for abortion and their donors have been reluctant to pay providers for interstate telehealth abortions, and a popular online directory for abortion care points them to out-of-state travel instead of telehealth providers in states with shield laws.

Kay's group, the Abortion Coalition for Telemedicine, has begun providing small grants to providers. Healthcare Across Borders also raises money to reimburse the shield law clinicians for the gap between what a patient can pay and the cost to providers, said executive director Jodi Jacobson.

Her group is financially supporting 16 providers. It can't afford to make up the entire difference, but has typically been able to reimburse up to 50% of the losses.

Foster said the MAP hasn't encountered some of the same funding barriers because it is part of a longstanding nonprofit, Cambridge Reproductive Health Consultant. Several national and local abortion funds are providing block grants to the nonprofit designated to support the MAP, but not for any specific patient, Foster said, in an effort to minimize the risk.

No state has yet attempted to prosecute providers within shield states, and Republican attorneys general may be waiting to see what happens in the November election or what the Supreme Court does.

Prior to the passage of the new telehealth shield laws, people in states with bans or restrictions found other ways to access medication abortion, including going to providers who were willing to prescribe pills that would be sent from India. Some patients ordered directly from India and from community networks like Las Libres, which would provide the pills without involving a medical professional.

Abortion seekers are still legally vulnerable. Some states criminalize self-managed abortion and, even before Roe was overturned, 61 people were prosecuted from 2000 to 2020 for allegedly ending their own pregnancy or helping others to do so.

The MAP is currently seeing 500 patients a month via telehealth — an average of 40 patients per clinician per day, including the weekends — and has the capacity to increase to 1,000, Foster said, but numbers beyond that would require additional clinicians.

"I don't think we have tapped at all the number of people who would utilize this service if it were more readily known," said Tracy Weitz, a professor of sociology at

Case 2:22-cv-00223-Z Document 217-5 Filed 01/16/25 Page 100 of 219 PageID 13568  
American University and leading abortion social science researcher. "There are still lots of people driving long distances to obtain abortion care because they didn't know this existed."

David Cohen, a Drexel University law professor who helped develop the state shield laws, said as interstate telehealth abortions become more common and existing clinicians aren't suffering legal consequences, more will likely join.

More groups are already considering doing this work. Kay said she has spoken with several medical professionals, including some brick-and-mortar institutions, interested in becoming shield law providers.

Adding more providers would also help distribute the legal risk, Weitz said. "It would be much harder to sue 100 doctors doing this service than to sue four doctors."

*Reach Shira Stein: shira.stein@sfchronicle.com; Twitter: @shiramstein*

June 12, 2024



**Shira Stein**

WASHINGTON CORRESPONDENT



Shira Stein is the San Francisco Chronicle's Washington correspondent, covering California's role in national politics and policy from the nation's capital. She writes about issues that matter to California residents — like housing, abortion and LGBTQ rights — and California's influence on Congress and the White House. She was the primary chronicler of the last year of Sen. Dianne Feinstein's life, including her health, familial financial feud, and death.

Shira was born and raised in the Bay Area and now lives in Washington, D.C. She joined the Chronicle in 2022 after spending four years as an award-winning health care reporter for Bloomberg Law, where she was key in its coverage of the Covid-19, the fall of Roe v. Wade and health costs. She is a graduate of American University and interned at the Washington Post, Bloomberg Law and the Colorado-based Durango Herald.

---

## Top Of The News



SAN FRANCISCO

## Businesses in most S.F. neighborhoods are still struggling to bring back customers. Here's data for every area

Sales tax revenue from April to June of this year shows that most S.F. neighborhoods still have not recovered economically from COVID. Here are the ones that have recovered the most — and the least.

SAN FRANCISCO

## SoMa merchants worry massive S.F. construction project will 'kill the businesses here'

SAN FRANCISCO

## Will Mayor Breed's intervention steady the reeling S.F. school district?

EAST BAY

# The FBI's corruption probe in Oakland raises questions about Rob Bonta and a \$700,000 mistake

## PERSONAL FINANCE

### It started with a text and cost her \$20,000. Why investment scams are getting harder to spot

Let's Play



Crossword



Flipart



Really Bad Chess



SpellTower



Top

About

Contact

Services

Account

**H E A R S T** newspapers © 2024 Hearst Communications, Inc. [Terms of Use](#) | [Privacy Notice](#) | [CA Notice at Collection](#) |

[Your CA Privacy Rights \(Shine the Light\)](#) | [DAA Industry Opt Out](#) | [Your Privacy Choices \(Opt Out of Sale/Targeted Ads\)](#)

## **EXHIBIT 73**

### **Armadillo Clinic**

[Español](#)[English](#)

## Fast abortion pill delivery with *support along the way*

We deliver abortion pills to you in 2-5 days, by US Postal Service priority mail.

Cost is \$200 — but we offer financial assistance. We charge what you can afford.

We send 1 mife and 12 miso — the same pills you get at an in-person clinic.

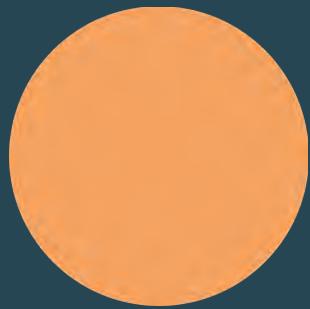
Experienced doctors and nurses are available by phone and private chat for your questions.

Click below to fill out a 10 minute survey and request pills.

[Request Pills](#)[Safe exit](#)[Register to Vote Here](#)

App. 001126

## Why Armadillo?



Fast

+

Affordable

+

Safe

+

Private

+

Support along the way

+



Armadillo Clinic specializes in abortion pills by telemedicine.

We send abortion pills confidentially by mail, in 2-5 days.

If you've asked yourself "How much does an abortion cost?" or "How do I get abortion pills by mail?" or "Can I get pills in my state?" Armadillo Clinic can help.

We are listed on trusted websites like [PlanCPills.org](#) and [INeedAnA.com](#).

[Request pills here](#)

Questions? [Click here to leave a secure message.](#)

Messages left after hours will be answered the following workday.

We never use cookies. We do not track or sell your data.

[Donate here.](#)

© Armadillo Health LLC | All Rights Reserved

## **EXHIBIT 74**

### **We Take Care of Us FAQ**

[Home](#)[Care](#)[FAQs](#)[Cooperative](#)[English](#) ▾

## Frequently asked questions

[About medication abortion](#)[Before medication abortion](#)[During medication abortion](#)[After medication abortion](#)[About our care](#)[Resources](#)[How to take abortion pills](#)

EXIT

## ABOUT medication abortion

[Who is eligible for medication abortion?](#) ▾[Is medication abortion safe?](#) ▾[Is medication abortion effective?](#) ▾[If medication abortion is safe, why am I hearing about abortion restrictions in the news?](#) ▾[Is abortion legal? Can I get in trouble for having or taking abortion pills?](#) ▾[I'm in a restrictive state, how can I access abortion pills safely?](#) ▾

## BEFORE medication abortion

How do I confirm that I'm pregnant?



How do I know how many weeks pregnant I am?



How do I find out about my options?



How does medication abortion work?



When during pregnancy is medication abortion an option?



Will abortion pills affect my ability to get pregnant in the future?



My blood type is Rh negative. Do I need to take Rhogam if I have a medication abortion?



What is ectopic pregnancy? How do I know if I have one?



I have an IUD. Is medication abortion an option for me?



Do I need an ultrasound?



How should I prepare for a medication abortion?



EXIT

## DURING medication abortion

How do I take abortion pills?



What is the best way to take misoprostol?



What should I expect after taking mifepristone?



What should I expect after taking misoprostol?



What if I vomit after taking the medication?



Can I eat and drink as usual during my medication abortion?



How can I manage my symptoms after taking abortion pills?



How do I know if my bleeding is normal?



What should I do if I think I'm having a complication? 

## AFTER medication abortion

How do I know if the abortion pills worked? How long will my bleeding last? Is it normal to continue to have cramps? When can I return to my usual work, school and/or exercise routine? When can I have sex again after taking abortion pills? When can I get pregnant again after taking abortion pills? When can I start taking birth control? How do I know if I have an infection? What should I do if I have misoprostol pills left over? 

EXIT

## ABOUT our care

Who are the providers? What is telehealth? Is it safe and private? How much does care cost? Do you take insurance? I can't pay \$150 for an abortion. Is financial assistance available? Do I have to schedule a video visit? 

No. A video visit is not required. Most of the care we provide is asynchronous. The first step is completing an online intake form. When completing the form, you tell us what contact method you would like to use for ongoing coordination of your care. Options include a secure

App. 001132

For some care services, such as perimenopause and menopause care, we may recommend a video visit as the best way to work with you to understand your priorities and goals, and develop your plan of care.

### Is support available if I have questions?

# How to take abortion pills



[Click to download](#)



[Haga clic para descargar](#)

## Resources

Medical Support



Emotional Support



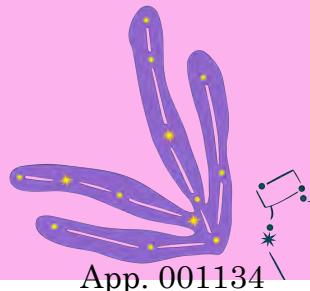
Legal Support



Security



EXIT



App. 001134

[Home](#)[Care](#)[Cooperative](#)[FAQs](#)**Follow Us**

© We Take Care of Us. All Rights Reserved. | Illustrations: Monse Navas | Site Credit | Privacy Policy |

[Terms and Conditions](#)

EXIT

[Home](#)[Care](#)[FAQs](#)[Cooperative](#)[English](#) ▾

## Frequently asked questions

[About medication abortion](#)[Before medication abortion](#)[During medication abortion](#)[After medication abortion](#)[About our care](#)[Resources](#)[How to take abortion pills](#)

EXIT

## ABOUT medication abortion

[Who is eligible for medication abortion?](#) ▾[Is medication abortion safe?](#) ▾[Is medication abortion effective?](#) ▾[If medication abortion is safe, why am I hearing about abortion restrictions in the news?](#) ▾[Is abortion legal? Can I get in trouble for having or taking abortion pills?](#) ▾[I'm in a restrictive state, how can I access abortion pills safely?](#) ▾

# BEFORE medication abortion

How do I confirm that I'm pregnant?



How do I know how many weeks pregnant I am?



How do I find out about my options?



How does medication abortion work?



When during pregnancy is medication abortion an option?



Will abortion pills affect my ability to get pregnant in the future?



My blood type is Rh negative. Do I need to take Rhogam if I have a medication abortion?



What is ectopic pregnancy? How do I know if I have one?



I have an IUD. Is medication abortion an option for me?



Do I need an ultrasound?



How should I prepare for a medication abortion?



EXIT

# DURING medication abortion

How do I take abortion pills?



What is the best way to take misoprostol?



What should I expect after taking mifepristone?



What should I expect after taking misoprostol?



What if I vomit after taking the medication?



Can I eat and drink as usual during my medication abortion?



How can I manage my symptoms after taking abortion pills?



How do I know if my bleeding is normal?



## AFTER medication abortion

How do I know if the abortion pills worked? ▼

How long will my bleeding last? ▼

Is it normal to continue to have cramps? ▼

When can I return to my usual work, school and/or exercise routine? ▼

When can I have sex again after taking abortion pills? ▼

When can I get pregnant again after taking abortion pills? ▼

When can I start taking birth control? ▼

How do I know if I have an infection? ▼

What should I do if I have misoprostol pills left over? ▼

EXIT

## ABOUT our care

Who are the providers? ^

We Take Care of Us is a cooperative run by Certified Nurse Midwives (CNMs). We are primary healthcare providers for individuals who have a uterus; from menarche, during the reproductive years and throughout menopause. CNMs focus on health promotion, wellness care, gynecologic and family planning services, as well as childbearing. Our midwives specialize in providing whole-person, trauma-informed and gender-expansive care. We are here to accompany you on your journey toward health and well being.

What is telehealth? Is it safe and private? ▼

How much does care cost? ▼

Do you take insurance? ▼

Case 2:22-cv-00223-Z Document 217-5 Filed 01/16/25 Page 117 of 219 PageID 13585

I can't pay \$150 for an abortion. Is financial assistance available? 

Do I have to schedule a video visit? 

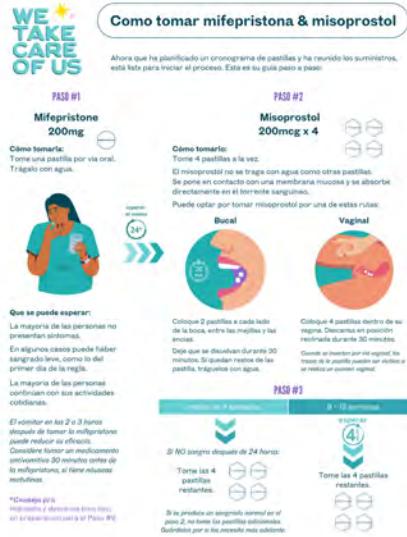
Is support available if I have questions? 

EXIT

# How to take abortion pills



[Click to download](#)



[Haga clic para descargar](#)

## Resources

Medical Support



Emotional Support



Legal Support



Security



EXIT



Follow Us

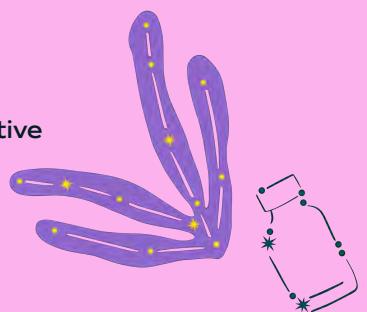


Home

Care

Cooperative

FAQs



**EXHIBIT 74a**

**We Take Care of Us**



Home Care FAQs Cooperative

English ▾

# Community Supported Abortion



Our Community Supported Abortion program provides medication abortion during the first 12 weeks of pregnancy, throughout the United States. Sliding scale pricing ranges from \$150 - \$600. You choose a payment amount that fits your economic and social situation. Additional assistance is available to those who need it.

EXIT

GET STARTED

EMPIEZA AHORA

## How it works:

- Complete a 10-15 minute online intake request

This form asks a series of screening questions to ensure that medication abortion is a safe option for you. We review your intake within 24 hours.

- Make your selected sliding scale payment
- Abortion pills are delivered to your door
- Receive ongoing support and accompaniment

*The legal context of abortion care is different in every state and policies are in flux. Find up-to-date information about your state's abortion laws, and the potential risks of receiving abortion pills by mail in your state [here](#).*

### Abortion pills in advance

Get abortion pills when you're not pregnant to have on hand just in case. If you decide to use them in the future, our midwives will be available to accompany you. Complete a quick intake request to get started.

PILLS IN ADVANCE

PASTILLAS POR ADELANTADO



### Period pills

Is your period late, but you haven't taken a pregnancy test? Period pills may help reestablish your period, even if you prefer not to confirm pregnancy. Complete a quick intake request to get started.

EXIT

PERIOD PILLS

PASTILLAS PARA EL PERIODO

perimenopause



Perimenopause and menopause have long been overlooked by the medical community. Unfortunately, this leaves many providers unprepared to respond to your symptoms and concerns during this time of life.

We Take Care of Us is different. We are up-to-date on the evidence and the available treatment options. We work with you to develop an individualized plan of care. Then we follow up and make adjustments as needed, to maximize your quality of life.

Get started with our online intake request. We follow up in 24-48 hours.

Sliding scale: \$80-\$200 consult fee.

Other care offerings:

## Emergency Contraception

EXIT

Emergency Contraception (EC) can be used to prevent pregnancy within the first 5 days after unprotected penis-in-vagina sex. We can order EC if you've had unprotected sex in the last 72 hours, or just want to have EC available for future use.

Sliding scale: \$10-\$60 consult fee, plus the cost of your medication.

Fill out this brief intake form and we'll follow up within 24 hours.

GET STARTED NOW

EMPIEZA AHORA

Emergency Contraception

Contraception Counseling and Prescriptions

Vaginal & Urinary Tract Infections

Sexual Health, Wellness & Education



Follow Us



[Home](#)

[Care](#)

[Cooperative](#)

[FAQs](#)

EXIT

© We Take Care of Us. All Rights Reserved. | Illustrations: Monse Navas | Site Credit | Privacy Policy | Terms and Conditions

**EXHIBIT 75**

**Plan C Missouri**

[Find Pills](#)[FAQ ▾](#)[Support & Resources ▾](#)[Get Involved ▾](#)[About Plan C ▾](#)[Plan C Guide > Missouri](#)

# Where people get abortion pills online in Missouri

Abortion access in Missouri is restricted, but abortion pills are still available by mail from providers outside of Missouri. Options below.

[Show my options](#)[Learn about potential legal risk](#)[Pregnancy Calculator](#)

 Please note:

Plan C does not sell pills. Use this guide to find an abortion pill provider.



[Find Pills](#)[FAQ ▾](#)[Support & Resources ▾](#)[Get Involved ▾](#)[About Plan C ▾](#)

## Online clinics that mail pills

For people who want abortion pills by mail and follow-up support from a clinician.

\$150 or less 1-5 days

Clinician support

FDA-approved medications

Potential legal risk

[See 8 results](#)

## Websites that sell pills

For people who want abortion pills by mail without consulting a clinician.

\$30 and up 3-9 days

Generic medications (from India)

Potential legal risk



[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾

## Community networks that mail pills

For people who can't afford other services and want free pills mailed by volunteers.



Free



5-10 days



Generic medications (from India)



Potential legal risk

[See 1 result](#)

## In-person clinics

For people who have access to transportation and would prefer to pick up abortion pills in person from an abortion clinic.



\$500 or more



Clinician support



FDA-approved medications

[See results](#)

[Find Pills](#)[FAQ ▾](#)[Support & Resources ▾](#)[Get Involved ▾](#)[About Plan C ▾](#)

the FAQ below, [Can I get in trouble for using abortion pills?](#)

You can also contact the free, confidential Repro Legal Helpline ([online](#) or at [844-868-2812](#)) to discuss your specific situation.

### Can I get in trouble for using abortion pills? ▾

### How do I choose from these provider types? ▾

## Online clinics that mail pills

### US-based online clinics

Online clinics are US-licensed clinicians who ship pills to you after a brief online form or phone/video visit. Follow up support is available.



### Why are online clinics listed if my state does not allow telehealth for abortion? ▾

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾**Filter by:** Accepts insurance Accepts Medicaid Sliding scale pricing Get pills in advance Se habla español**Showing 6 of 6 results**Sort by: **Price** ▾**ABUZZ**

Price

**\$150 or less**

Delivery

**1-5 days**

Ages

**16+**

Pills by mail with clinician support

For pregnancies up to 13 weeks

 Get pills in advance Financial assistance available Learn about the potential legal risk of using this service[MORE INFORMATION](#)[↗ REQUEST PILLS](#)**AID ACCESS**

Price

**\$150 or less**

Delivery

**2-5 days**

Ages

**All**

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾ Financial assistance available [Learn about the potential legal risk of using this service](#)[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

## ARMADILLO CLINIC

Price

**\$200 or less**

Delivery

**2-5 days**

Ages

**18+**

Pills by mail with clinician support

For pregnancies up to 12 weeks

 Financial assistance available [Learn about the potential legal risk of using this service](#)[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

## CAMBRIDGE REPRODUCTIVE HEALTH CONSULTANTS

Price

**\$250 or less**

Delivery

**2-5 days**

Ages

**16+**

Pills by mail with clinician support

For pregnancies up to 11 weeks



[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾

this service

[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

## WE TAKE CARE OF US

Price

**\$150-\$600**

Delivery

**1-5 days**

Ages

**All**

Pills by mail with clinician support (hablamos español)

For pregnancies up to 12 weeks

[Get pills in advance](#)[Financial assistance available](#)[Learn about the potential legal risk of using this service](#)[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

## A SAFE CHOICE

Price

**\$150**

Delivery

**1-5 days**

Ages

**All**

Pills by mail with clinician support

For pregnancies up to 13 weeks



App. 001154

[Find Pills](#)[FAQ ▾](#)[Support & Resources ▾](#)[Get Involved ▾](#)[About Plan C ▾](#)[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

## International online clinics

These services are provided by clinicians licensed in other countries who ship pills to you after a brief online or video visit. Pills provided are generic versions.

**Showing 2 of 2 results**

### ABORTION PILLS IN PRIVATE

Price

**\$90**

Delivery

**8-14 days**

Ages

**16+**

Pills by mail with clinician support

For pregnancies up to 11 weeks

 No financial assistance available [Learn about the potential legal risk of using this service](#)[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

### WOMEN ON WEB

Price

Delivery

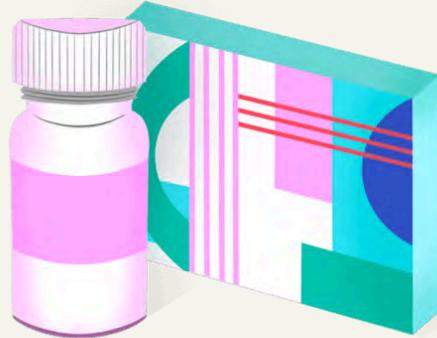
Ages



[Find Pills](#)[FAQ ▾](#)[Support & Resources ▾](#)[Get Involved ▾](#)[About Plan C ▾](#) Get pills in advance Financial assistance available [Learn about the potential legal risk of using this service](#)[MORE INFORMATION](#)[↗ REQUEST PILLS](#)[Back to top ↕](#)

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾

These websites sell abortion pills but do not include any additional support. You can still get free medical support for your abortion from the [M+A Hotline](#).



**Important:** These websites may not follow strict digital security protocols. Read our [digital privacy tips](#) to learn how to protect yourself when ordering or searching for abortion pills online.

**Read the FAQs below for more information on how these sites work.**

**What are websites that sell pills?** ▾

**Are these websites legit?** ▾

**How do I choose one of these websites?** ▾

**What kind of kit do I order?** ▾

**How many pills do I need?** ▾

**What if I have medical questions?** ▾

[Find Pills](#)[FAQ ▾](#)[Support & Resources ▾](#)[Get Involved ▾](#)[About Plan C ▾](#)

Price      Delivery      Ages  
**\$30–50**    **3–6 business days**    **All**

Pills by mail

 Get pills in advance

 [Learn about the potential legal risk of using this service](#)

[MORE INFORMATION](#)

 [REQUEST PILLS](#)

## HOME ABORTIONRX

Price      Delivery      Ages  
**\$33**    **12–19 business days**    **All**

Pills by mail

 Get pills in advance

 [Learn about the potential legal risk of using this service](#)

[MORE INFORMATION](#)

 [REQUEST PILLS](#)

## PRIVATE EMMA



[Find Pills](#)[FAQ ▾](#)[Support & Resources ▾](#)[Get Involved ▾](#)[About Plan C ▾](#) Get pills in advance Financial assistance available [Learn about the potential legal risk of using this service](#)[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

## MEDSIDE 24

Price

**\$44**

Delivery

**3–6 business days**

Ages

**All**

Pills by mail

 Get pills in advance [Learn about the potential legal risk of using this service](#)[MORE INFORMATION](#)[↗ REQUEST PILLS](#)[See all 13 websites that sell pills](#)[Back to top ^](#)

[Find Pills](#)[FAQ ▾](#)[Support & Resources ▾](#)[Get Involved ▾](#)[About Plan C ▾](#)

## COMMUNITY NETWORKS

### that mail pills

These are networks of volunteers in the US that ship generic abortion pills for free. The pills often come repackaged in plastic baggies. You will need to request pills by email.



#### What are community support networks?



#### What if I have medical questions?



### Showing 1 of 1 results

#### ACCESSMA

Price

**\$0**

Delivery

**5-12 days**

Ages

**All**

Community network that mails pills



[Learn about the potential legal risk of using this service](#)

[MORE INFORMATION](#)[!\[\]\(d6171377551a5537a325cb60f1e59404\_img.jpg\) REQUEST PILLS](#)

[Find Pills](#)[FAQ ▾](#)[Support & Resources ▾](#)[Get Involved ▾](#)[About Plan C ▾](#)

## In-person clinics

Clinics offer abortion pill pickup and other in-person abortion care options. To find the nearest clinic to Missouri, use any of these search tools:



### I Need an Abortion

A comprehensive, regularly updated, and personalized resource for abortion seekers in the US.

[\*\*↗ VISIT WEBSITE\*\*](#)

### Missouri: Abortion Clinic Guide

Information about Missouri abortion clinics, nearby clinic options, and financial assistance from local support resources.

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Back to top](#) ▾

## Live phone & text support

### For Medical Questions

#### The M+A Hotline

Free and confidential support from a clinician at the Miscarriage + Abortion Hotline. (M+A does not sell pills)

[CALL OR TEXT](#)[↗ VISIT WEBSITE](#)

### For Logistical & Emotional Support

#### Reprocare Healthline

Free and confidential help understanding how to get pills and how to use them.

[CALL OR TEXT](#)[↗ VISIT WEBSITE](#)

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾

Connect with a lawyer for free and confidential legal information.

[CALL OR TEXT](#)[↗ VISIT WEBSITE](#)

## Automated support

**NEW**

### Charley the Chatbot

Provides users with personalized abortion options, including information about different abortion care methods, nearby clinics, accessing abortion pills, and referrals to support services.

[↗ VISIT WEBSITE](#)

### Frequently Asked Questions

Get answers to common questions about how abortion pills work and how to access them.



[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾

## Get the Plan C Newsletter

For breaking developments in abortion pill access and opportunities to take action.

[Sign Up](#)


Plan C is a project under the fiscal sponsorship of the National Women's Health Network, a 501c3 organization. Our generous donors make this critical work possible.

[Find Pills →](#)


### FAQ

Finding  
Abortion  
Pills  
About  
Abortion  
Pills  
Using  
Abortion  
Pills  
Can I get  
in Trouble  
for Using  
Abortion  
Pills?

### Support and Resources

Quick  
Resource  
List  
Medical  
+ Emotional  
Support  
Legal  
Support  
Financial  
Support  
Abortion  
Pill  
Instructions  
Abortion  
Care Apps  
Other  
Options for  
Getting an  
Abortion

### Get Involved

Plan C  
Community  
Take Action  
Stickers &  
Flyers  
Plan C  
Merch  
Social Media  
Toolkit  
Partner with  
Us  
For Medical  
Professionals  
Work with  
Plan C  
Donate

### About Plan C

Mission  
Team  
Press  
Research &  
Learning  
PLAN C: The  
Documentary  
2023 Annual  
Report  
Media  
inquiries  
Contact Us



[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾Site by [Eyes Open](#)

**Disclaimer:** This is not legal or medical advice and does not substitute for the representation of an attorney or the advice of a doctor. No attorney client relationship has been formed by reviewing this material.



Abortion Care Network

## **EXHIBIT 76**

### **Plan C Idaho**

[Plan C Guide](#) > [Idaho](#)

# Where people get abortion pills online in Idaho

Abortion access in Idaho is restricted, but abortion pills are still available by mail from providers outside of Idaho. Options below.

[Show my options](#)[Learn about potential legal risk](#)[Pregnancy Calculator](#)

Please note:

Plan C does not sell pills. Use this guide to find an abortion pill provider.

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾



## Online clinics that mail pills

For people who want abortion pills by mail and follow-up support from a clinician.

\$150 or less 1-5 days

Clinician support

FDA-approved medications

Potential legal risk

See 7 results



## Websites that sell pills

For people who want abortion pills by mail without consulting a clinician.

\$30 and up 3-9 days

Generic medications (from India)

Potential legal risk

[Find Pills](#)

[FAQ](#) ▾

[Support & Resources](#) ▾

[Get Involved](#) ▾

[About Plan C](#) ▾



## Community networks that mail pills

For people who can't afford other services and want free pills mailed by volunteers.

Free 5-10 days

Generic medications (from India)

Potential legal risk

See 1 result



## In-person clinics

For people who have access to transportation and would prefer to pick up abortion pills in person from an abortion clinic.

\$500 or more Clinician support

FDA-approved medications

Find Pills

FAQ ▾

Support & Resources ▾

Get Involved ▾

About Plan C ▾

**⚠ Learn about potential legal risks of accessing pills from alternative suppliers by reading the FAQ below, "Can I get in trouble for using abortion pills?"**

You can also contact the free, confidential Repro Legal Helpline ([online](#) or at [844-868-2812](#)) to discuss your specific situation.

#### Can I get in trouble for using abortion pills? ▼

#### How do I choose from these provider types? ▼

## Online clinics that mail pills

### US-based online clinics

Online clinics are US-licensed clinicians who ship pills to you after a brief online form or phone/video visit. Follow up support is available.



#### Why are online clinics listed if my state does not allow telehealth for abortion? ▼

[Find Pills](#)[FAQ ▾](#)[Support & Resources ▾](#)[Get Involved ▾](#)[About Plan C ▾](#)

## What if I have medical questions?

### Filter by:

Accepts insurance

Accepts Medicaid

Sliding scale pricing

Get pills in advance

Se habla español

Showing 5 of 5 results

Sort by: Price ▾

### ABUZZ

Price

**\$150 or less**

Delivery

**1-5 days**

Ages

**16+**

Pills by mail with clinician support

For pregnancies up to 13 weeks

 Get pills in advance

 Financial assistance available

 [Learn about the potential legal risk of using this service](#)

[MORE INFORMATION](#)

[REQUEST PILLS](#)

### AID ACCESS

[Find Pills](#)

[FAQ ▾](#)

[Support & Resources ▾](#)

[Get Involved ▾](#)

[About Plan C ▾](#)

 Get pills in advance Financial assistance available Learn about the potential legal risk of using this service[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

## CAMBRIDGE REPRODUCTIVE HEALTH CONSULTANTS

Price

**\$250 or less**

Delivery

**2-5 days**

Ages

**16+**

Pills by mail with clinician support

For pregnancies up to 11 weeks

 Get pills in advance Financial assistance available Learn about the potential legal risk of using this service[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

## WE TAKE CARE OF US

[Find Pills](#)[FAQ ▾](#)[Support & Resources ▾](#)[Get Involved ▾](#)[About Plan C ▾](#)

For pregnancies up to 12 weeks

 Get pills in advance

 Financial assistance available

 [Learn about the potential legal risk of using this service](#)

[MORE INFORMATION](#)

 [REQUEST PILLS](#)

## A SAFE CHOICE

Price

**\$150**

Delivery

**1-5 days**

Ages

**All**

Pills by mail with clinician support

For pregnancies up to 13 weeks

 Get pills in advance

 [Learn about the potential legal risk of using this service](#)

[MORE INFORMATION](#)

 [REQUEST PILLS](#)

## International online clinics

These services are provided by clinicians licensed in other countries who ship pills to you after a brief online or video visit. Pills provided are generic versions.

[Find Pills](#)

[FAQ](#) ▾

[Support & Resources](#) ▾

[Get Involved](#) ▾

[About Plan C](#) ▾

## ABORTION PILLS IN PRIVATE

Price      Delivery      Ages  
**\$90**      **8-14 days**      **16+**

Pills by mail with clinician support

For pregnancies up to 11 weeks

 No financial assistance available

 [Learn about the potential legal risk of using this service](#)

[MORE INFORMATION](#)

[REQUEST PILLS](#)

## WOMEN ON WEB

Price      Delivery      Ages  
**\$120 or less**      **3-5 business days**      **All**

Pills by mail with clinician support (Hablamos Español/falamos Português)

For pregnancies up to 12 weeks

 Get pills in advance

 Financial assistance available

 [Learn about the potential legal risk of using this service](#)

[MORE INFORMATION](#)

[REQUEST PILLS](#)

[Find Pills](#)

[FAQ](#) ▾

[Support & Resources](#) ▾

[Get Involved](#) ▾

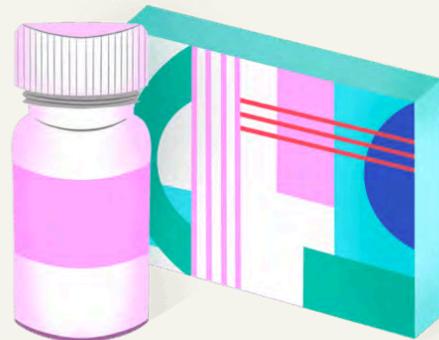
[About Plan C](#) ▾

## Websites that sell pills

These websites sell abortion pills but do not include any additional support. You can still get free medical support for your abortion from the [M+A Hotline](#).

**Important:** These websites may not follow strict digital security protocols. Read our [digital privacy tips](#) to learn how to protect yourself when ordering or searching for abortion pills online.

Read the FAQs below for more information on how these sites work.



What are websites that sell pills?

Are these websites legit?

How do I choose one of these websites?

What kind of kit do I order?

[Find Pills](#)

[FAQ](#) ▾

[Support & Resources](#) ▾

[Get Involved](#) ▾

[About Plan C](#) ▾

Showing 4 of 13 results

Sort by: Price ▾

### LIFE EASY ON PILLS

Price

**\$30–50**

Delivery

**3–6 business days**

Ages

**All**

Pills by mail



Get pills in advance



Learn about the potential legal risk of using this service

[MORE INFORMATION](#)

[REQUEST PILLS](#)

### HOME ABORTIONRX

Price

**\$33**

Delivery

**12–19 business days**

Ages

**All**

Pills by mail



Get pills in advance



Learn about the potential legal risk of using this service

[Find Pills](#)

[FAQ ▾](#)

[Support & Resources ▾](#)

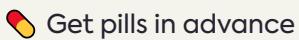
[Get Involved ▾](#)

[About Plan C ▾](#)

## PRIVATE EMMA

Price      Delivery      Ages  
**\$35**      **3-6 business days**      **All**

Pills by mail  
For pregnancies up to 12 weeks



**⚠️ Learn about the potential legal risk of using this service**

[MORE INFORMATION](#)

[↗ REQUEST PILLS](#)

## MEDSIDE 24

Price      Delivery      Ages  
**\$44**      **3-6 business days**      **All**

Pills by mail



**⚠️ Learn about the potential legal risk of using this service**

[MORE INFORMATION](#)

[↗ REQUEST PILLS](#)

[Find Pills](#)

[FAQ](#) ▾

[Support & Resources](#) ▾

[Get Involved](#) ▾

[About Plan C](#) ▾

## Community networks that mail pills

These are networks of volunteers in the US that ship generic abortion pills for free. The pills often come repackaged in plastic baggies. You will need to request pills by email.



### What are community support networks?

### What if I have medical questions?

Showing 1 of 1 results

#### IDAHO ACCESS

Price

\$0

Delivery

5-10 days

Ages

All

Community network that mails pills



[Learn about the potential legal risk of using this service](#)

[Find Pills](#)

[FAQ](#) ▾

[Support & Resources](#) ▾

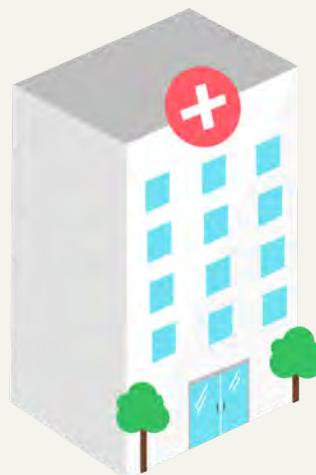
[Get Involved](#) ▾

[About Plan C](#) ▾

[Back to top ^](#)

## In-person clinics

Clinics offer abortion pill pickup and other in-person abortion care options. To find the nearest clinic to Idaho, use any of these search tools:



### I Need an Abortion

A comprehensive, regularly updated, and personalized resource for abortion seekers in the US.

[VISIT WEBSITE](#)

### Idaho: Abortion Clinic Guide

[Find Pills](#)[FAQ ▾](#)[Support & Resources ▾](#)[Get Involved ▾](#)[About Plan C ▾](#)

[VISIT WEBSITE](#)[Back to top ^](#)

## Live phone & text support

### For Medical Questions

#### The M+A Hotline

Free and confidential support from a clinician at the Miscarriage + Abortion Hotline. (M+A does not sell pills)

[CALL OR TEXT](#)[VISIT WEBSITE](#)

### For Logistical & Emotional Support

#### Reprocare Healthline

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾

## For Legal Questions

### ReproLegal Helpline

Connect with a lawyer for free and confidential legal information.

[CALL OR TEXT](#)[↗ VISIT WEBSITE](#)

## Automated support

**NEW**

### Charley the Chatbot

Provides users with personalized abortion options, including information about different abortion care methods, nearby clinics, accessing abortion pills, and referrals to support services.

[↗ VISIT WEBSITE](#)[Find Pills](#)[FAQ ▾](#)[Support & Resources ▾](#)[Get Involved ▾](#)[About Plan C ▾](#)

abortion pills work and how to access them.

[READ FAQ](#)

## Get the Plan C Newsletter

For breaking developments in abortion pill access and opportunities to take action.

[Sign Up](#)


Plan C is a project under the fiscal sponsorship of the National Women's Health Network, a 501c3 organization. Our generous donors make this critical work possible.

[Find Pills →](#)


FAQ	Support and Resources	Get Involved	About Plan C
Finding Abortion Pills	Quick Resource List	Plan C Community	Mission Team
About Abortion	Medical + Emotional Support	Take Action	Press Research & Learning
Abortion Pills	Legal Support	Stickers & Flyers	PLAN C: The Documentary
Using Abortion Pills	Support	Plan C Merch	2023 Annual Report
Can I get in Trouble for Using Abortion Pills?	Financial Support	Social Media Toolkit	Media inquiries
Abortion Pills?	Abortion Pill Instructions	Partner with Us	Contact Us
	Abortion Abortion	For Medical Professionals	
		Work with Plan C	

[Find Pills](#)
[FAQ](#)
[Support & Resources](#)
[Get Involved](#)
[About Plan C](#)

**Language**[Español](#)

© 2024 National Women's Health Network

Site by [Eyes Open](#)

[Privacy & Terms](#)

**Disclaimer:** This is not legal or medical advice and does not substitute for the representation of an attorney or the advice of a doctor. No attorney client relationship has been formed by reviewing this material.

**Abortion Care Network**

**EXHIBIT 77**

**Plan C Kansas**

Plan C Guide &gt; Kansas



# Where to get abortion pills in Kansas

Abortion is legal in Kansas in person and online, visit below.

Show my options

Learn about potential risks

Pregnancy Calculator

Please note:

Plan C does not sell pills

Find Pills

FAQ ▾

Support & Resources

## ABORTION ON DEMAND



### About this provider

Abortion on Demand states that it provides virtual visits to adult patients who are up to 10 weeks pregnant on the day that they schedule their appointment. We donate our excess funds to support independent abortion clinics providing later or more complex care. Same day scheduling is often available; overnight shipping and comfort medications are included. Discreet text-based follow-up and 24/7 clinician phone support if needed. Our software will confirm you are physically in the state you selected at the time of your scheduled video appointment. We do not ship to post office box addresses. In Pennsylvania, patients must pick up their medications at designated locations in Maryland or New Jersey. In Washington DC, patients must pick up their medications at designated locations in Maryland.

### Price: \$389 or less

- Majority of profits are donated to support later gestation access.

### Delivery: 1 day

- Depends on time of order and waiting requirements in some states

### Ages: 18+

### Services offered

Abortion pills (mifepristone + misoprostol)



## Online clinics that mail pills

For people who want abortion pills by mail and follow-up support from a clinician.

\$150 or less 1-5 days

Clinician support

FDA-approved medications

See 8 results



## Websites that sell pills

For people who want abortion pills by mail without consulting a clinician.

\$30 and up 3-9 days

Generic medications (from India)

Potential legal risk

Find Pills

FAQ ▾

Support & Resou

## ABORTION ON DEMAND



### About this provider

Abortion on Demand states that it provides virtual visits to adult patients who are up to 10 weeks pregnant on the day that they schedule their appointment. We donate our excess funds to support independent abortion clinics providing later or more complex care. Same day scheduling is often available; overnight shipping and comfort medications are included. Discreet text-based follow-up and 24/7 clinician phone support if needed. Our software will confirm you are physically in the state you selected at the time of your scheduled video appointment. We do not ship to post office box addresses. In Pennsylvania, patients must pick up their medications at designated locations in Maryland or New Jersey. In Washington DC, patients must pick up their medications at designated locations in Maryland.

### Price: \$389 or less

- Majority of profits are donated to support later gestation access.

### Delivery: 1 day

- Depends on time of order and waiting requirements in some states

### Ages: 18+

### Services offered

Abortion pills (mifepristone +



## Community networks that mail pills

For people who can't afford other services and want free pills mailed by volunteers.

Free 5-10 days

Generic medications (from India)

Potential legal risk

See 1 result



## In-person clinics

For people who have access to transportation and would prefer to pick up abortion pills in person from an abortion clinic.

\$500 or more Clinician support

FDA-approved medications

See results



Find Pills

FAQ ▾

Support & Resou

## ABORTION ON DEMAND



### About this provider

Abortion on Demand states that it provides virtual visits to adult patients who are up to 10 weeks pregnant on the day that they schedule their appointment. We donate our excess funds to support independent abortion clinics providing later or more complex care. Same day scheduling is often available; overnight shipping and comfort medications are included. Discreet text-based follow-up and 24/7 clinician phone support if needed. Our software will confirm you are physically in the state you selected at the time of your scheduled video appointment. We do not ship to post office box addresses. In Pennsylvania, patients must pick up their medications at designated locations in Maryland or New Jersey. In Washington DC, patients must pick up their medications at designated locations in Maryland.

### Price: \$389 or less

- Majority of profits are donated to support later gestation access.

### Delivery: 1 day

- Depends on time of order and waiting requirements in some states

### Ages: 18+

### Services offered

Abortion pills (mifepristone +



**⚠ Learn about potential legal risks of accessing the FAQ below, "Can I get in trouble for using abortion pills?"**

You can also contact the free, confidential Reproductive Health Line to discuss your specific situation.

**Can I get in trouble for using abortion pills?**

**How do I choose from these provider types?**

## Online clinics that mail pills

### US-based online clinics

Online clinics are US-licensed clinicians who ship pills to you after a brief online form or phone/video visit. Follow up support is available.

**How do I choose a provider?**

[Find Pills](#)

[FAQ](#) ▾

[Support & Resources](#)

## ABORTION ON DEMAND

### About this provider

Abortion on Demand states that it provides virtual visits to adult patients who are up to 10 weeks pregnant on the day that they schedule their appointment. We donate our excess funds to support independent abortion clinics providing later or more complex care. Same day scheduling is often available; overnight shipping and comfort medications are included. Discreet text-based follow-up and 24/7 clinician phone support if needed. Our software will confirm you are physically in the state you selected at the time of your scheduled video appointment. We do not ship to post office box addresses. In Pennsylvania, patients must pick up their medications at designated locations in Maryland or New Jersey. In Washington DC, patients must pick up their medications at designated locations in Maryland.

### Price: \$389 or less

- Majority of profits are donated to support later gestation access.

### Delivery: 1 day

- Depends on time of order and waiting requirements in some states

### Ages: 18+

### Services offered

Abortion pills (mifepristone +

Stay Safe: Read our digital privacy statement

comfortable with. Some providers require a patient to be physically present at their office to communicate with you through text or email.

Cost and ship times are also a factor. Sometimes a provider offers sliding scale pricing or another form of payment.

To learn more about a provider's services click "More" on their website.

### What if I have medical questions?

#### Filter by:

Accepts insurance

Accepts Medicaid

Sliding pricing

Showing 6 of 6 results

### ABUZZ

Price

**\$150 or less**

Delivery

**1-5 days**

Ages

**16+**

Pills by mail with clinician support

For pregnancies up to 13 weeks

 Get pills in advance

 Financial assistance available

MORE INFORMATION

↗ REQUEST PILLS

Find Pills

FAQ ▾

Support & Resources

## ABORTION ON DEMAND



### About this provider

Abortion on Demand states that it provides virtual visits to adult patients who are up to 10 weeks pregnant on the day that they schedule their appointment. We donate our excess funds to support independent abortion clinics providing later or more complex care. Same day scheduling is often available; overnight shipping and comfort medications are included. Discreet text-based follow-up and 24/7 clinician phone support if needed. Our software will confirm you are physically in the state you selected at the time of your scheduled video appointment. We do not ship to post office box addresses. In Pennsylvania, patients must pick up their medications at designated locations in Maryland or New Jersey. In Washington DC, patients must pick up their medications at designated locations in Maryland.

#### Price: \$389 or less

- Majority of profits are donated to support later gestation access.

#### Delivery: 1 day

- Depends on time of order and waiting requirements in some states

#### Ages: 18+

### Services offered

 Abortion pills (mifepristone +

## ABORTION ON DEMAND



Price              Delivery              Ages  
**\$150 or less**      **2-5 days**      **All**

Pills by mail with clinician support  
For pregnancies up to 13 weeks

Get pills in advance

Financial assistance available

[MORE INFORMATION](#)

[REQUEST PILLS](#)

### WE TAKE CARE OF US

Price              Delivery              Ages  
**\$150-\$600**      **1-5 days**      **All**

Pills by mail with clinician support (hablamos español)  
For pregnancies up to 12 weeks

Get pills in advance

Financial assistance available

[MORE INFORMATION](#)

[REQUEST PILLS](#)

### CAMBRIDGE REPRODUCTIVE HEALTH CONSULTANTS

[Find Pills](#)

[FAQ](#) ▾

[Support & Resou](#)

#### About this provider

Abortion on Demand states that it provides virtual visits to adult patients who are up to 10 weeks pregnant on the day that they schedule their appointment. We donate our excess funds to support independent abortion clinics providing later or more complex care. Same day scheduling is often available; overnight shipping and comfort medications are included. Discreet text-based follow-up and 24/7 clinician phone support if needed. Our software will confirm you are physically in the state you selected at the time of your scheduled video appointment. We do not ship to post office box addresses. In Pennsylvania, patients must pick up their medications at designated locations in Maryland or New Jersey. In Washington DC, patients must pick up their medications at designated locations in Maryland.

#### Price: \$389 or less

- Majority of profits are donated to support later gestation access.

#### Delivery: 1 day

- Depends on time of order and waiting requirements in some states

#### Ages: 18+

#### Services offered

Abortion pills (mifepristone +

 Get pills in advance Financial assistance available[MORE INFORMATION](#)[REQUEST PILLS](#)

## A SAFE CHOICE

Price

**\$150**

Delivery

**1-5 days**

Ages

**All**

Pills by mail with clinician support  
For pregnancies up to 13 weeks

 Get pills in advance[MORE INFORMATION](#)[REQUEST PILLS](#)

## ABORTION ON DEMAND

Price

**\$389 or less**

Delivery

**1 day**

Ages

**18+**

Pills by mail with clinician support  
For pregnancies up to 10 weeks

 Financial assistance available[Find Pills](#)[FAQ](#) ▾[Support & Resources](#)

## ABORTION ON DEMAND



### About this provider

Abortion on Demand states that it provides virtual visits to adult patients who are up to 10 weeks pregnant on the day that they schedule their appointment. We donate our excess funds to support independent abortion clinics providing later or more complex care. Same day scheduling is often available; overnight shipping and comfort medications are included. Discreet text-based follow-up and 24/7 clinician phone support if needed. Our software will confirm you are physically in the state you selected at the time of your scheduled video appointment. We do not ship to post office box addresses. In Pennsylvania, patients must pick up their medications at designated locations in Maryland or New Jersey. In Washington DC, patients must pick up their medications at designated locations in Maryland.

### **Price: \$389 or less**

- Majority of profits are donated to support later gestation access.

### **Delivery: 1 day**

- Depends on time of order and waiting requirements in some states

### **Ages: 18+**

### **Services offered**

 Abortion pills (mifepristone +



## ABORTION ON DEMAND

### International online clinics

These services are provided by clinicians licensed in other countries who ship pills to you after a brief online or video visit. Pills provided are generic versions.

**Showing 2 of 2 results**

#### ABORTION PILLS IN PRIVATE

Price	Delivery	Ages
<b>\$90</b>	<b>8-14 days</b>	<b>16+</b>

Pills by mail with clinician support  
For pregnancies up to 11 weeks

No financial assistance available

[Learn about the potential legal risk of using this service](#)

[MORE INFORMATION](#)

[REQUEST PILLS](#)

#### WOMEN ON WEB

Price	Delivery	Ages
<b>\$120 or less</b>	<b>3-5 business days</b>	<b>All</b>

Pills by mail with clinician support (Hablamos Español/falamos Português)

[Find Pills](#)

[FAQ](#) ▾

[Support & Resou](#)

#### About this provider

Abortion on Demand states that it provides virtual visits to adult patients who are up to 10 weeks pregnant on the day that they schedule their appointment. We donate our excess funds to support independent abortion clinics providing later or more complex care. Same day scheduling is often available; overnight shipping and comfort medications are included. Discreet text-based follow-up and 24/7 clinician phone support if needed. Our software will confirm you are physically in the state you selected at the time of your scheduled video appointment. We do not ship to post office box addresses. In Pennsylvania, patients must pick up their medications at designated locations in Maryland or New Jersey. In Washington DC, patients must pick up their medications at designated locations in Maryland.

#### Price: \$389 or less

- Majority of profits are donated to support later gestation access.

#### Delivery: 1 day

- Depends on time of order and waiting requirements in some states

#### Ages: 18+

#### Services offered

Abortion pills (mifepristone +

⚠️ Learn about the potential legal risk of using this service

MORE INFORMATION

↗ REQUEST PILLS

## Websites that sell pills

These websites sell abortion pills but do not include any additional support. You can still get free medical support for your abortion from the [M+A Hotline](#).

**Important:** These websites may not follow strict digital security protocols. Read our [digital privacy tips](#) to learn how to protect yourself when ordering or searching for abortion pills online.

**Read the FAQs below for more information on how these sites work.**

What are websites that sell pills?

Find Pills

FAQ ▾

Support & Resou

## ABORTION ON DEMAND



### About this provider

Abortion on Demand states that it provides virtual visits to adult patients who are up to 10 weeks pregnant on the day that they schedule their appointment. We donate our excess funds to support independent abortion clinics providing later or more complex care. Same day scheduling is often available; overnight shipping and comfort medications are included. Discreet text-based follow-up and 24/7 clinician phone support if needed. Our software will confirm you are physically in the state you selected at the time of your scheduled video appointment. We do not ship to post office box addresses. In Pennsylvania, patients must pick up their medications at designated locations in Maryland or New Jersey. In Washington DC, patients must pick up their medications at designated locations in Maryland.

### Price: \$389 or less

- Majority of profits are donated to support later gestation access.

### Delivery: 1 day

- Depends on time of order and waiting requirements in some states

### Ages: 18+

### Services offered

⌚ Abortion pills (mifepristone +

What kind of kit do I order?

How many pills do I need?

What if I have medical questions?

**Showing 4 of 13 results**

### LIFE EASY ON PILLS

Price      Delivery      Ages  
**\$30-50**    **3-6 business days**    **All**

Pills by mail

 Get pills in advance

 [Learn about the potential legal risk of using this service](#)

[MORE INFORMATION](#)

 [REQUEST PILLS](#)

### HOME ABORTIONRX

Price      Delivery      Ages  
-

[Find Pills](#)

[FAQ](#) ▾

[Support & Resou](#)

## ABORTION ON DEMAND



### About this provider

Abortion on Demand states that it provides virtual visits to adult patients who are up to 10 weeks pregnant on the day that they schedule their appointment. We donate our excess funds to support independent abortion clinics providing later or more complex care. Same day scheduling is often available; overnight shipping and comfort medications are included. Discreet text-based follow-up and 24/7 clinician phone support if needed. Our software will confirm you are physically in the state you selected at the time of your scheduled video appointment. We do not ship to post office box addresses. In Pennsylvania, patients must pick up their medications at designated locations in Maryland or New Jersey. In Washington DC, patients must pick up their medications at designated locations in Maryland.

### Price: \$389 or less

- Majority of profits are donated to support later gestation access.

### Delivery: 1 day

- Depends on time of order and waiting requirements in some states

### Ages: 18+

### Services offered

 Abortion pills (mifepristone +

 [Learn about the potential legal risk of using this service](#)

[MORE INFORMATION](#)[REQUEST PILLS](#)

## PRIVATE EMMA

Price

**\$35**

Delivery

**3-6 business days**

Ages

**All**

Pills by mail

For pregnancies up to 12 weeks

 [Get pills in advance](#)
 [Financial assistance available](#)

 [Learn about the potential legal risk of using this service](#)

[MORE INFORMATION](#)[REQUEST PILLS](#)

## MEDSIDE 24

Price

**\$44**

Delivery

**3-6 business days**

Ages

**All**

Pills by mail

 [Get pills in advance](#)
[Find Pills](#)[FAQ](#) ▾[Support & Resources](#)

## ABORTION ON DEMAND



### About this provider

Abortion on Demand states that it provides virtual visits to adult patients who are up to 10 weeks pregnant on the day that they schedule their appointment. We donate our excess funds to support independent abortion clinics providing later or more complex care. Same day scheduling is often available; overnight shipping and comfort medications are included. Discreet text-based follow-up and 24/7 clinician phone support if needed. Our software will confirm you are physically in the state you selected at the time of your scheduled video appointment. We do not ship to post office box addresses. In Pennsylvania, patients must pick up their medications at designated locations in Maryland or New Jersey. In Washington DC, patients must pick up their medications at designated locations in Maryland.

### Price: \$389 or less

- Majority of profits are donated to support later gestation access.

### Delivery: 1 day

- Depends on time of order and waiting requirements in some states

### Ages: 18+

### Services offered

 [Abortion pills \(mifepristone +](#)

Stay Safe: Read our digital privacy statement

[MORE INFORMATION](#)[REQUEST PILLS](#)[See all 13 websites](#)

## Community networks that mail pills

These are networks of volunteers in the US that ship generic abortion pills for free. The pills often come repackaged in plastic baggies. You will need to request pills by email.

**What are community support networks?**

**What if I have medical questions?**

**Showing 1 of 1 results**

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#)

## ABORTION ON DEMAND



### About this provider

Abortion on Demand states that it provides virtual visits to adult patients who are up to 10 weeks pregnant on the day that they schedule their appointment. We donate our excess funds to support independent abortion clinics providing later or more complex care. Same day scheduling is often available; overnight shipping and comfort medications are included. Discreet text-based follow-up and 24/7 clinician phone support if needed. Our software will confirm you are physically in the state you selected at the time of your scheduled video appointment. We do not ship to post office box addresses. In Pennsylvania, patients must pick up their medications at designated locations in Maryland or New Jersey. In Washington DC, patients must pick up their medications at designated locations in Maryland.

### Price: \$389 or less

- Majority of profits are donated to support later gestation access.

### Delivery: 1 day

- Depends on time of order and waiting requirements in some states

### Ages: 18+

### Services offered

Abortion pills (mifepristone +

5-12 days

Community network that mails pills



Learn about the potential legal risk of using this service

MORE INFORMATION

REQUEST PILLS

## In-person clinics

Clinics offer abortion pill pickup and other in-person abortion care options. To find the nearest clinic to Kansas, use any of these search tools:

### I Need an Abortion

A comprehensive, regularly updated, and personalized resource for abortion seekers in the US.

Find Pills

FAQ ▾

Support & Resou

## ABORTION ON DEMAND

### About this provider

Abortion on Demand states that it provides virtual visits to adult patients who are up to 10 weeks pregnant on the day that they schedule their appointment. We donate our excess funds to support independent abortion clinics providing later or more complex care. Same day scheduling is often available; overnight shipping and comfort medications are included. Discreet text-based follow-up and 24/7 clinician phone support if needed. Our software will confirm you are physically in the state you selected at the time of your scheduled video appointment. We do not ship to post office box addresses. In Pennsylvania, patients must pick up their medications at designated locations in Maryland or New Jersey. In Washington DC, patients must pick up their medications at designated locations in Maryland.

### Price: \$389 or less

- Majority of profits are donated to support later gestation access.

### Delivery: 1 day

- Depends on time of order and waiting requirements in some states

### Ages: 18+

### Services offered

Abortion pills (mifepristone +



## ABORTION ON DEMAND

### Kansas: Abortion Clinic Guide

Information about Kansas abortion clinics, nearby clinic options, and financial assistance from local support resources.

[VISIT WEBSITE](#)



### Live phone &

### For Medical Questions

#### The M+A Hotline

Free and confidential support from a clinician at the Miscarriage + Abortion Hotline. (M+A does not sell pills)

[Find Pills](#)

[FAQ](#) ▾

[Support & Resou](#)

#### About this provider

Abortion on Demand states that it provides virtual visits to adult patients who are up to 10 weeks pregnant on the day that they schedule their appointment. We donate our excess funds to support independent abortion clinics providing later or more complex care. Same day scheduling is often available; overnight shipping and comfort medications are included. Discreet text-based follow-up and 24/7 clinician phone support if needed. Our software will confirm you are physically in the state you selected at the time of your scheduled video appointment. We do not ship to post office box addresses. In Pennsylvania, patients must pick up their medications at designated locations in Maryland or New Jersey. In Washington DC, patients must pick up their medications at designated locations in Maryland.

#### Price: \$389 or less

- Majority of profits are donated to support later gestation access.

#### Delivery: 1 day

- Depends on time of order and waiting requirements in some states

#### Ages: 18+

#### Services offered

- Abortion pills (mifepristone +

## For Logistical & Emotional Support

### Reprocare Healthline

Free and confidential help understanding how to get pills and how to use them.

[CALL OR TEXT](#)
[VISIT WEBSITE](#)

## For Legal Questions

### ReproLegal Helpline

Connect with a lawyer for free and confidential legal information.

[CALL OR TEXT](#)
[VISIT WEBSITE](#)


## Automated support

NEW

### Charley the Chatbot

Provides users with personalized abortion options, including information about different abortion care methods, nearby clinics,

[Find Pills](#)
[FAQ](#)
[Support & Resources](#)

## ABORTION ON DEMAND



### About this provider

Abortion on Demand states that it provides virtual visits to adult patients who are up to 10 weeks pregnant on the day that they schedule their appointment. We donate our excess funds to support independent abortion clinics providing later or more complex care. Same day scheduling is often available; overnight shipping and comfort medications are included. Discreet text-based follow-up and 24/7 clinician phone support if needed. Our software will confirm you are physically in the state you selected at the time of your scheduled video appointment. We do not ship to post office box addresses. In Pennsylvania, patients must pick up their medications at designated locations in Maryland or New Jersey. In Washington DC, patients must pick up their medications at designated locations in Maryland.

#### Price: \$389 or less

- Majority of profits are donated to support later gestation access.

#### Delivery: 1 day

- Depends on time of order and waiting requirements in some states

#### Ages: 18+

### Services offered

Abortion pills (mifepristone +

## ABORTION ON DEMAND



### Frequently Asked Questions

Get answers to common questions about how abortion pills work and how to access them.

[READ FAQ](#)



### Get +

For break  
and oppo

Your En



Plan C is a project under the fiscal sponsorship of the National Women's Health Network, a 501c3 organization. Our generous donors make this critical work

#### FAQ

- Finding
- Abortion
- Pills
- About
- Abortion
- Pills

[Find Pills](#)

[FAQ](#) ▾

[Support & Resou](#)

#### About this provider

Abortion on Demand states that it provides virtual visits to adult patients who are up to 10 weeks pregnant on the day that they schedule their appointment. We donate our excess funds to support independent abortion clinics providing later or more complex care. Same day scheduling is often available; overnight shipping and comfort medications are included. Discreet text-based follow-up and 24/7 clinician phone support if needed. Our software will confirm you are physically in the state you selected at the time of your scheduled video appointment. We do not ship to post office box addresses. In Pennsylvania, patients must pick up their medications at designated locations in Maryland or New Jersey. In Washington DC, patients must pick up their medications at designated locations in Maryland.

#### Price: \$389 or less

- Majority of profits are donated to support later gestation access.

#### Delivery: 1 day

- Depends on time of order and waiting requirements in some states

#### Ages: 18+

#### Services offered

- Abortion pills (mifepristone +



for Using  
Abortion  
Pills?

#### Language

Español

© 2024 National Women's Health Network  
Site by Eyes Open

**Disclaimer:** This is not legal or medical advice and does not represent the opinion of an attorney or the advice of a doctor. No relationship has been formed by reviewing this material.

## ABORTION ON DEMAND



### About this provider

Abortion on Demand states that it provides virtual visits to adult patients who are up to 10 weeks pregnant on the day that they schedule their appointment. We donate our excess funds to support independent abortion clinics providing later or more complex care. Same day scheduling is often available; overnight shipping and comfort medications are included. Discreet text-based follow-up and 24/7 clinician phone support if needed. Our software will confirm you are physically in the state you selected at the time of your scheduled video appointment. We do not ship to post office box addresses. In Pennsylvania, patients must pick up their medications at designated locations in Maryland or New Jersey. In Washington DC, patients must pick up their medications at designated locations in Maryland.

### Price: \$389 or less

- Majority of profits are donated to support later gestation access.

### Delivery: 1 day

- Depends on time of order and waiting requirements in some states

### Ages: 18+

### Services offered

- Abortion pills (mifepristone +

## **EXHIBIT 78**

### **Kansas Abortion Clinic Guide**

# Kansas Abortion Clinic Guide from Plan C Pills

This abortion clinic guide offers up-to-date information about:

1. [Abortion Clinics in Kansas](#)
2. [How to get abortion pills by mail](#)
3. [Kansas abortion support resources](#)



People in Kansas are accessing local abortion clinics, online abortion pill options, and financial assistance from abortion support resources. **Plan C** shares reliable information that empowers people to make an informed choice that's best for them.

## Clinics

### Abortion Clinics in Kansas

There are currently **5 abortion clinics in Kansas** offering in-person services. This guide will help you find the closest open abortion clinic to your home. Some locations may have limited availability so call the clinics to find out if they are able to meet your needs.

#### Kansas Abortion Clinics

You can also find information about Kansas abortion clinics here:

<https://www.ineedana.com/us/kansas>

1. [Planned Parenthood - Wichita Health Center](#)

App. 001203

[Visit Website](#)[\(316\) 263-7575](#)**2. Aria Medical**

555 N Woodlawn Street, Building 1, Suite 102, Wichita, KS  
67208

[Visit Website](#)[\(316\) 350-7688](#)**3. Center for Women's Health**

4840 College Boulevard, Overland Park, KS 66211

[Visit Website](#)[\(913\) 491-6878](#)**4. Planned Parenthood - Kansas City Health Center**

6013 Leavenworth Rd, Kansas City, KS 66104

[Visit Website](#)[\(913\) 345-1400](#)**5. Planned Parenthood - Comprehensive Health Services**

4401 W 109th Street, #100, Overland Park, KS 66211

[Visit Website](#)[\(913\) 345-1400](#)**6. Trust Women Wichita (Temporarily closed)**

5107 East Kellogg Drive, Wichita, KS 67218

[Visit Website](#)[\(316\) 260-6934](#)

## Abortion Clinics Near Kansas

If the healthcare services you need are not available within Kansas, you can find the closest abortion clinic options to your home here:

- [Colorado Abortion Clinics](#)
- [Illinois Abortion Clinics](#)
- [Nebraska Abortion Clinics](#)

Pills



## How to get abortion pills in Kansas

People are getting [abortion pills in Kansas](#) by mail and having medically-safe abortions at home by using these resources:

- [How to Order an Abortion Pill Online](#)

This guide from Plan C Pills explains [how to get an abortion pill in Kansas](#). Compare online providers, prices and delivery

App. 001204



To learn about the potential legal risks of accessing pills through alternative suppliers: [Read our FAQ](#). To discuss your specific situation, contact the free, confidential Repro Legal Helpline [online](#) or at [844-868-2812](#).

## Assistance

---

### Abortion Support Resources in Kansas

These local resources that provide abortion support, information, and financial assistance to people in Kansas.

- [Kansas Abortion Fund](#)
- [Abortion Funds: Midwest Access Coalition](#)
- [ACLU Kansas: Reproductive Freedom](#)
- [AbortionFinder: Abortion Providers in Kansas](#)
- [Reproductive Rights in Kansas](#)
- [CARE Abortion Clinic near Kansas](#)

**Local Guides**

## Abortion Guides for Cities in Kansas

These local guides from Plan C Pills provide abortion clinic and support resources for cities throughout Kansas.

### How to get an abortion in...

- [Wichita, Kansas](#)
- [Overland Park, Kansas](#)
- [Kansas City, Kansas](#)
- [Olathe, Kansas](#)
- [Topeka, Kansas](#)



### Live phone & text support

#### For Medical Questions:

##### The M+A Hotline

Free and confidential support from a clinician at the Miscarriage + Abortion Hotline. (M+A does not sell pills)

Call or text: [833-246-2632](tel:833-246-2632)

[M+A Hotline Website](#)

#### Step-by-Step Guide: How to get an abortion pill by Mail

#### For Logistical & Emotional Support

##### Reprocare Healthline

Free and confidential help understanding how to get pills and how to use them.

Call or text: [833-226-7821](tel:833-226-7821)

[Reprocare Healthline Website](#)

**For Legal Questions:****ReproLegal Helpline**

Connect with a lawyer for free and confidential legal information.

Call or text: [844-868-2812](tel:844-868-2812)

[Repro Legal  
Helpline Website](#)



[Donate to Plan C](#)

Plan C is a project under the fiscal sponsorship of the National Women's Health Network, a 501c3 organization. Our generous donors make this critical work possible.

[Complete Open Clinic List](#)

[City Abortion Clinic Guides](#)

**Abortion Pills**

[Find Pills](#)  
[FAQ](#)  
[Support & Resources](#)  
[Research](#)  
[Library](#)

**Get Involved**

[Take Action](#)  
[Become an Ambassador](#)  
[Partner with us](#)  
[Stickers & Flyers](#)  
[Provider Toolkit](#)  
[Donate](#)

**Disclaimer:**

This is not legal or medical advice and does not substitute for the representation of an attorney or the advice of a doctor. No attorney client relationship has been formed by reviewing this material. Plan C provides research-based information about sources of abortion pills but does not endorse the services listed in our Guide to Finding Pills. Plan C is not affiliated with any of the services listed in our directory. For questions about ordering, paying for, or delivery of abortion pills from these services, please contact the service directly.

**About Plan C**

[Press](#)  
[Team](#)  
[History](#)  
[Work With Us](#)  
[Contact](#)

## **EXHIBIT 79**

### **Hey Jane – About Us**

# Welcome to your safe space

Hey Jane is your patient-centered, virtual reproductive and sexual health care haven.

[Get started](#)

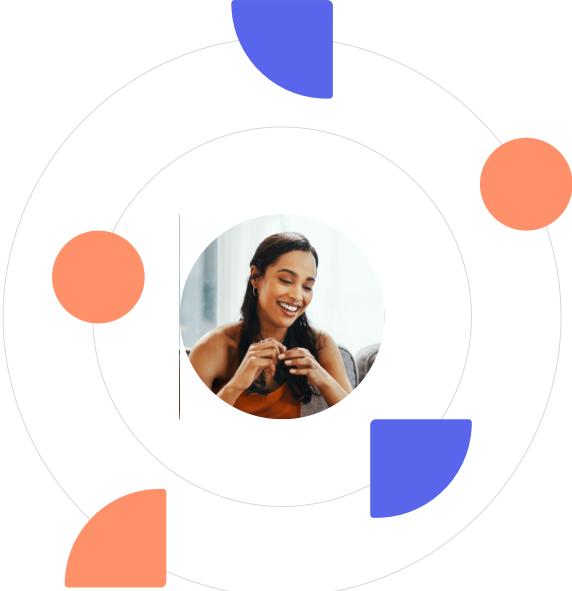
## Be seen, heard, and cared for

From day one, we've been committed to providing safe, discreet medication abortion treatment (no in-person clinic visit necessary)—and have helped more than 65,000 people get the care they need. Today, we offer a range of reproductive and sexual health care services from the comfort and convenience of your phone.

[Explore our services](#)

## U.S.-licensed providers from top schools and employers

Our team includes full-time, US-licensed doctors, advanced practice clinicians, nurses, and patient care advocates with experience in abortion and more reproductive care services. They come from top schools and healthcare providers including Mount Sinai, UCSF, Planned Parenthood, and more.



# Safe, discreet, judgment-free virtual health care, from a team that truly cares

Meet some of the members on our team.



## **ALYSSA WAGNER, DNP, RN, APRN, WHNP-BC**

Alyssa Wagner (she/her) is a board certified women's health nurse practitioner specializing in reproductive and sexual health care for over 14 years. She's passionate about increasing access to health care, removing stigma, and spending time with her family.

## **HANNA KIM, RN**

Hanna Kim (she/them) is a Registered Nurse with 10 years of experience working in reproductive health. She's obsessed with her dog and can tell you how to DIY a hot pack.

## **SALLY RASHID, RN**

Sally Rashid (she/her) is a Registered Nurse who has worked in reproductive care for over a decade as a doula, nurse, and advocate for abortion access. In addition to helping patients, she's a seasoned writer, music lover, and mother.



**“The staff were 10/10. I couldn’t have had a better experience.”**

## Pay less than in-clinic care

Hey Jane accepts [select insurance plans](#) and offers income-based sliding-scale pricing based on each patient's personal and financial circumstances. For medication abortion, we also partner with [abortion funds](#) to help you pay for treatment.

[Get started](#)

## Pay as little as \$0 with insurance

Hey Jane accepts select insurance plans and offers self-pay patients sliding-scale pricing based on your income. We also partner with [abortion funds](#) to help you pay for treatment.



[See all ways to pay](#)

## Hey Jane is for...



### Anyone seeking care

If you need reproductive or sexual health care—including abortion care—we're here for you. Hey Jane strives to be an inclusive clinic, and accepts patients located in our eligible states regardless of their insurance status, gender identity, or immigration status.



### Anyone who supports reproductive freedom

As one of the first virtual clinics to offer abortion care, Hey Jane has always stood up for access. When you support Hey Jane, you support reproductive freedom and quality of life for all.

[Get started](#)[Take action](#)



## We're not afraid to talk about abortion, are you?

Join the Un-Whisper Network, Hey Jane's virtual community for people who are passionate about reproductive and sexual health.

You'll get science-backed intel, access to exclusive events, and more delivered to your inbox—all while making an impact.





**Get abortion access updates and reproductive health real talk, delivered to your inbox.**



### CONTACT

**Patients:** [Message us on the Spruce app](#)

**Email:** info@heyjane.co

**Press inquiries:** press@heyjane.co

### CONNECT WITH US



### SERVICES

Medication abortion

Emergency contraception

UTI treatment

Herpes treatment

Yeast infection treatment

Bacterial vaginosis treatment

Birth control

### HEY JANE

[About us](#)

FAQs

Careers

### LEGAL

HIPAA notice of privacy practices

Privacy Policy

Refund Policy

Telemedicine Consent

Terms of Service

### STATE ABORTION GUIDES

California

Colorado

Connecticut

Delaware

Hawaii

Illinois

Maine

Maryland

Minnesota

### RESOURCES

What is an abortion?

How to get an abortion

How to get an abortion on campus



New Hampshire  
New Jersey  
New Mexico  
New York  
Oregon  
Rhode Island  
Vermont  
Virginia  
Washington  
District of Columbia  
All abortion state guides

HeyJane

© 2024 POSSIBLE HEALTH INC. ALL RIGHTS RESERVED

## **EXHIBIT 80**

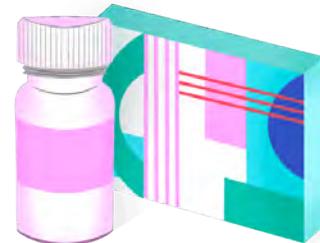
### **Websites that Sell Pills**

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#) [Español](#)[\*\*< GO BACK\*\*](#)

# Websites That Sell Pills

These websites sell abortion pills but do not include any additional support. You can still get free medical support for your abortion from the [M+A Hotline](#).

**Important:** These websites may not follow strict digital security protocols. Read our [digital privacy tips](#) to learn how to protect yourself when ordering or searching for abortion pills online.



**Read the FAQs below for more information on how these sites work.**

## What are websites that sell pills?



Websites that sell pills are e-commerce websites that sell and ship pills to addresses in all U.S. states. They do not require a prescription for the medications, do not require you to upload your ID, and do not provide a medical consultation or any kind of support.

## Are these websites legit?



Yes, these websites are legit. They sell generic abortion pills that are not regulated or inspected by the US government. Plan C regularly tests these websites by buying pills from them. The services we list in our guide all shipped pills to a home address. The pills were real (based on laboratory testing). But, we do not operate these sites, and cannot guarantee they will be reliable in the future.

**Important:** These websites may not follow strict digital security protocols. Read our [digital privacy tips](#) to learn how to protect yourself when ordering or searching for abortion pills online.

## How do I choose one of these websites?



[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#) [Español](#)

We suggest you check their website and pick the one that you feel most comfortable ordering from. If you are not sure what pills to order, read the FAQ below, "What kind of kit do I order?".

#### What kind of kit do I order?



Most of these websites sell abortion pills in a blister pack called an MTP Kit. These kits usually contain 5 pills: 1 dose of mifepristone (1 pill) and 1 dose of misoprostol (4 pills). Sometimes these packs will be listed under different names, or will be sold in bulk quantities, which may seem confusing. What is important is that you get the correct dosage for your pregnancy. Read the next section "How many pills do I need?" for dosage information.

**Important note about payment:** It is very common for these websites to email or call soon after they get your order to request a different form of payment. They often say the credit card did not go through. They often ask the buyer to use a PayPal account in a person's name or in the name of another business. These payment requests do seem unusual, but they worked every time we tested them.

The pills usually arrive by the US Postal Service. They usually do not require a signature.

#### How many pills do I need?



If you are under 9 weeks pregnant you usually need 1 mifepristone pill and 4 misoprostol pills.

**People who are more than 9 weeks pregnant may need additional misoprostol pills (4 or 8 pills) to complete the abortion.** Many of these websites sell misoprostol pills separately (sometimes called Cytotec or Cytolog), which can be added to your order.

**Read this guide** for instructions on how to take abortion pills and for recommended dosages. If you don't know how many weeks pregnant you are you can use our **pregnancy calculator**.

#### What if I have medical questions?



Websites that sell pills do not offer medical support. If you have medical questions during your abortion, you can get support and have your questions answered by contacting **The Miscarriage and Abortion Hotline**. This hotline provides free, confidential medical information and support by phone and text. Often they can help you address a problem without needing to go to a clinic or hospital.

If you are experiencing complications and feel the need to seek care from a health care provider at a clinic or hospital, you should do so. Your clinician does not need to know that you have used abortion pills to provide appropriate follow up care. Clinicians also can't tell you've taken abortion pills unless you tell them, or if you inserted the misoprostol vaginally and the pills did not fully dissolve. Many people use misoprostol orally to prevent this possible detection.

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#) [Español](#)

You can also get free, nonjudgmental emotional support before, during, and after your abortion from the folks at [All-Options Talkline](#), [Exhale](#), [Faith Aloud](#), or [Reprocare](#).

#### [Can I get in trouble for using abortion pills?](#) ^

The short answer is: it depends, and it's complicated.

Legal risk can depend on:

- where you live,
- your identity: race, ethnicity, income level, etc.
- and how far along you are in pregnancy.

In the end, it's up to each person to make their own decision about risk. Click the headings below for more information about these risks.

#### [Where someone lives makes a difference.](#) ^

Many states allow legal access to abortion pills through clinics or telehealth services.

People who get pills in states where these services are legal should face no legal risk.

Pills are available by mail in all states, even in states that ban clinic-based abortion care. This is possible because some states have “shield laws” that protect clinicians when they provide telehealth care to someone in another state. People in all states can also get abortion pills from alternate suppliers like international online clinics, community networks, and websites that sell pills. We mark alternate suppliers with an alert icon in our [Guide](#) to let you know that they may have legal risk.

To understand the potential legal risks of using alternate suppliers, you can contact the ReproLegal Helpline, a free legal resource that can help answer your questions: visit [reprolegalhelpline.org](http://reprolegalhelpline.org) or call or text 844-868-2812.

#### [What if a state totally bans abortion?](#) ^

Some states have laws against abortion. These laws mean that with limited exceptions medical providers and clinics in those states can't do an abortion procedure or provide abortion pills.

A ban that blocks providers from offering care does not necessarily block a person from using pills on their own. However, a person who self-manages their abortion can face legal risk: people in the US are criminalized for all kinds of reasons, with outsized impact on certain identities or socioeconomic backgrounds.

People in states that ban abortion can still get abortion pills by mail from telehealth providers in “shield law” states (see above) or alternate suppliers, like international online clinics, websites that sell pills, and community networks that mail them for free.

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#) [Español](#)

instance if they are not free to leave their home or do not want to risk going through an immigration checkpoint (which can be within 100 miles of any US border).

The [Repro Legal Helpline](#) provides free and confidential legal advice that can help people better understand the laws and legal risk they may face. Contact them [online](#) or call **844-868-2812**.

#### How big is the legal risk?



This is a really hard question to answer.

We have some information about what has happened in the past. From 2000 to 2020, at least 61 people who have self-managed an abortion or have helped someone else [were arrested or prosecuted](#). During that same time, many people self-managed abortions (tens of thousands or more).

It is unclear how new abortion laws will affect future criminalization of people for self-managing an abortion.

Those who are already at greater risk of criminalization because of their race, gender identity, economic status, or other factors may have a higher risk of prosecution.

The [Repro Legal Helpline](#) provides free and confidential legal advice that can help people better understand the laws and legal risk they may face. Contact them [online](#) or call **844-868-2812**.

#### Why have some people gotten in legal trouble?



#### Have Legal Questions?



The [Repro Legal Helpline](#) provides free and confidential legal advice that can help people better understand the laws and legal risk they may face. Contact them [online](#) or call **844-868-2812**.

For more analysis of potential legal risk, [read this article](#).

**Showing 14 of 14 results**

Sort by: **Price** ▾

#### PILL PULSE

Price **\$29** Delivery **3-6 business days** Ages **All**

Pills by mail

#### LIFE EASY ON PILLS

Price **\$30-50** Delivery **3-6 business days** Ages **All**

Pills by mail

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#) [Español](#)[MORE INFORMATION](#)[↗ REQUEST PILLS](#)[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

### HOME ABORTIONRX

Price      Delivery      Ages  
**\$33**      **12-19 business days**      All

Pills by mail



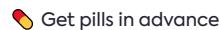
Get pills in advance

[Learn about the potential legal risk of using this service](#)
[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

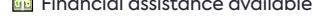
### PRIVATE EMMA

Price      Delivery      Ages  
**\$35**      **3-6 business days**      All

Pills by mail  
For pregnancies up to 12 weeks



Get pills in advance



Financial assistance available

[Learn about the potential legal risk of using this service](#)
[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

### MEDSIDE 24

Price      Delivery      Ages  
**\$44**      **3-6 business days**      All

Pills by mail



Get pills in advance

[Learn about the potential legal risk of using this service](#)
[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

### HOME ABORTION PILLSRX

Price      Delivery      Ages  
**\$45**      **3-6 business days**      All

Pills by mail



Get pills in advance

[Learn about the potential legal risk of using this service](#)
[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

### YBYCMEDS

Price      Delivery      Ages  
**\$46**      **3-6 business days**      All

Pills by mail

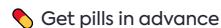


Get pills in advance

### PRIVACY PILL RX

Price      Delivery      Ages  
**\$120**      **3-6 business days**      All

Pills by mail



Get pills in advance

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#) [Español](#)

### SAFE PHARMACY

Price      Delivery      Ages  
**\$198**    **3-6 business days**    All

Pills by mail

[Get pills in advance](#)
[Learn about the potential legal risk of using this service](#)
[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

### ABORTION PILLS RX

Price      Delivery      Ages  
**\$230**    **4-6 business days**    All

Pills by mail

[Get pills in advance](#)
[Learn about the potential legal risk of using this service](#)
[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

### GENERIC ABORTION PILLS

Price      Delivery      Ages  
**\$291**    **3-6 business days**    All

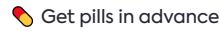
Pills by mail

[Get pills in advance](#)
[Learn about the potential legal risk of using this service](#)
[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

### ABORTION RX

Price      Delivery      Ages  
**\$299**    **3-6 business days**    All

Pills by mail

[Get pills in advance](#)
[Learn about the potential legal risk of using this service](#)
[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

### ONLINE ABORTION PILL RX

Price      Delivery      Ages  
**\$470**    **3-6 business days**    All

Pills by mail

[Get pills in advance](#)
[Learn about the potential legal risk of using this service](#)
[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

### ABORTION PRIVACY

Price      Delivery      Ages  
**\$470**    **3-6 business days**    All

Pills by mail

[Get pills in advance](#)
[Learn about the potential legal risk of using this service](#)
[MORE INFORMATION](#)[↗ REQUEST PILLS](#)

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#) [Español](#)

## Live phone & text support

### For Medical Questions

#### The M+A Hotline

Free and confidential support from a clinician at the Miscarriage + Abortion Hotline. (M+A does not sell pills)

[CALL OR TEXT](#)[VISIT WEBSITE](#)

### For Logistical & Emotional Support

#### Reprocare Healthline

Free and confidential help understanding how to get pills and how to use them.

[CALL OR TEXT](#)[VISIT WEBSITE](#)

### For Legal Questions

#### ReproLegal Helpline

Connect with a lawyer for free and confidential legal information.

[CALL OR TEXT](#)[VISIT WEBSITE](#)

## Automated support

NEW

### Charley the Chatbot

Provides users with personalized abortion options, including information about different abortion care methods, nearby clinics,

### Frequently Asked Questions

Get answers to common questions about how abortion pills work and how to access them.

[Find Pills](#)[FAQ](#) ▾[Support & Resources](#) ▾[Get Involved](#) ▾[About Plan C](#) ▾[Donate](#) [Español](#)

## Get the Plan C Newsletter

For breaking developments in abortion pill access and opportunities to take action.

[Sign Up](#)


Plan C is a project under the fiscal sponsorship of the National Women's Health Network, a 501c3 organization. Our generous donors make this critical work possible.

[Find Pills →](#)


<a href="#">FAQ</a>	<a href="#">Support and Resources</a>	<a href="#">Get Involved</a>	<a href="#">About Plan C</a>
<a href="#">Finding Abortion Pills</a>	<a href="#">Quick Resource List</a>	<a href="#">Plan C Community</a>	<a href="#">Mission Team</a>
<a href="#">About Abortion Pills</a>	<a href="#">Medical + Emotional Support</a>	<a href="#">Take Action</a>	<a href="#">Press</a>
<a href="#">Using Abortion Pills</a>	<a href="#">Legal Support</a>	<a href="#">Stickers &amp; Flyers</a>	<a href="#">Research &amp; Learning</a>
<a href="#">Pills</a>	<a href="#">Financial Support</a>	<a href="#">Plan C Merch</a>	<a href="#">PLAN C: The Documentary</a>
<a href="#">Can I get in Trouble for Using Abortion Pills?</a>	<a href="#">Abortion Pill Instructions</a>	<a href="#">Social Media Toolkit</a>	<a href="#">2023 Annual Report</a>
<a href="#">Using Abortion Pills?</a>	<a href="#">Abortion Care Apps</a>	<a href="#">Partner with Us</a>	<a href="#">Media inquiries</a>
	<a href="#">Other Options for Getting an Abortion</a>	<a href="#">Work with Plan C</a>	<a href="#">Contact Us</a>
		<a href="#">Donate</a>	

[Language](#)
[Español](#)

© 2024 National Women's Health Network

Site by [Eyes Open](#)

[Privacy & Terms](#)

**Disclaimer:** This is not legal or medical advice and does not substitute for the representation of an attorney or the advice of a doctor. No attorney client relationship has been formed by reviewing this material.



## **EXHIBIT 81**

**Websites Selling Unapproved Abortion Pills Are  
Booming -- WSJ**

<https://www.wsj.com/articles/websites-selling-unapproved-abortion-pills-are-booming-11661079601>

# Websites Selling Unapproved Abortion Pills Are Booming

Abortion pills can sell on some sites for as much as \$500. It isn't always clear who makes them or where they come from.

By [Dominique Mosbergen](#) [Follow](#) and [Vibhuti Agarwal](#) [Follow](#)

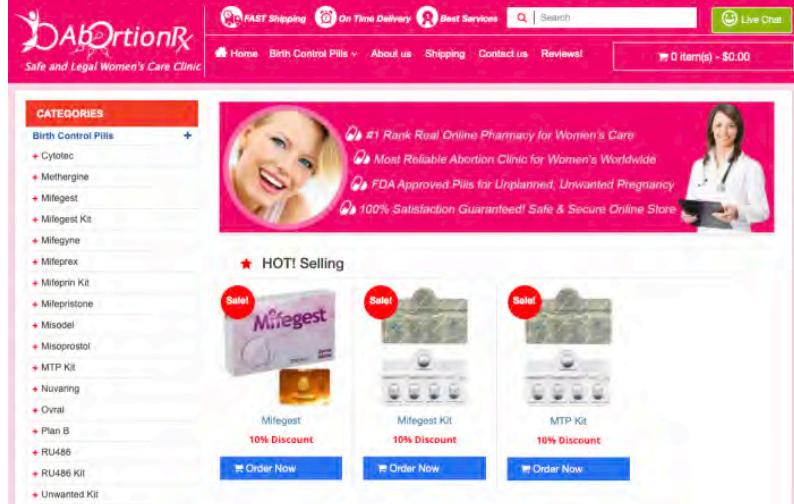
Aug. 21, 2022 7:00 am ET

A murky online market for abortion pills is thriving as some U.S. states tighten abortion restrictions.

Dozens of websites state they ship abortion drugs anywhere in the U.S. without a prescription, which violates Food and Drug Administration rules. Most of the sites don't clearly state who operates them or where they get the pills. The operator of one website said demand for abortion pills has surged since the Supreme Court removed constitutional protection for abortion in June.

The sites, some registered overseas, are distinct from U.S.-based telehealth operators that prescribe and sometimes ship abortion pills to patients in states that allow the procedure.

Sites selling abortion drugs without a prescription charge as much as \$500 for a pack of abortion pills. Medical support isn't included.



A screenshot obtained by The Wall Street Journal shows the home page of Abortionrx.com. The site is among dozens of websites that sell drugs typically used in a medication abortion without the need of a prescription. PHOTO: UNCREDITED

The websites provide access to pills for patients who can't reach a clinic, or who live in states where telehealth consultations for abortion aren't allowed, abortion-rights advocates said. But the unregulated market creates risks, they said, including that the pills arrive too late to be used effectively. People who buy abortion pills online without a prescription could face criminal charges, particularly in states that restrict the procedure, legal experts said.

Some health experts expressed concerns about websites potentially selling bogus drugs or not providing adequate information and medical support. "You don't know what you're getting," said Al Carter, executive director of the National Association of Boards of Pharmacy, which represents state pharmacy boards.

Two medications, mifepristone and misoprostol, are typically used in a medication-abortion regimen, which the FDA has approved for up to 10 weeks of pregnancy. Websites selling abortion pills without a prescription are mainly selling pills that haven't been reviewed by the FDA, according to descriptions on the sites and information from buyers. The FDA has sent complaints to some companies associated with websites selling abortion pills online.

"Drugs that have circumvented regulatory safeguards may be contaminated, counterfeit, contain varying amounts of active ingredients, or contain different ingredients altogether," an FDA spokesperson said.

Studies have shown medication abortion to be safe and effective, including when taken without a doctor's supervision. Patients typically take the drugs at home even when they have been prescribed by a doctor.



Two medications, mifepristone and misoprostol, are typically used in a medication-abortion regimen.

PHOTO: NATALIE BEHRING FOR THE WALL STREET JOURNAL

Medside24.com, a website based in Kazakhstan, said its abortion-pill sales across the U.S. have doubled since Roe v. Wade was overturned. The site buys abortion drugs manufactured by companies in China, Russia and Vietnam, a representative for the site said, including Vietnam-based Stellapharm J.V. Co.

Stellapharm said it manufactures mifepristone and misoprostol but wasn't aware its products were being sold on medside24.com. Stellapharm's pills are only sold with a prescription in Vietnam, a spokeswoman said.

A woman from Florida said she ordered pills from abortionrx.com in July. She said that would have preferred to visit a clinic near her home but didn't want to wait three weeks until an appointment was available. Abortion is legal in Florida until 15 weeks of gestation.

No screening or prescription was required to complete the \$249 purchase via PayPal, she said, and the pills arrived four days later in a brown envelope from an address in Las Vegas. There were no instructions, she said, so she followed guidance she found online to take the pills over several days. She said she didn't experience complications during her abortion.

Rablon didn't respond to requests for comment.

At least six sites selling abortion pills without a prescription in July were registered under the name Richard Asamoah Agyemang of Denver, according to information on domain ownership. Mr. Agyemang said he is a college student and web developer. He said he doesn't sell abortion pills. "I don't know who made those websites," Mr. Agyemang said. Two of the sites had been taken offline in August.



Following the Supreme Court decision to overturn Roe v. Wade, WSJ's Daniela Hernandez took a look at the new attention on abortion pills. She explains how misoprostol and mifepristone work together to terminate a pregnancy, as well as the potential side effects of a medical abortion. Illustration: David Fang

Some of the abortion-pill websites say that they sell pills from manufacturers in India. Three manufacturers mentioned on some sites, Zydus Lifesciences Ltd., Cipla Ltd. and Naman Pharma Drugs, said they weren't aware of the sites. Cipla said it stopped making abortion medication about seven years ago. Naman manufactures abortion pills on a contract basis for companies in Africa and doesn't export to the U.S., a spokesman said.

A teacher in Ohio said she sought out abortion pills this spring using Plan C, a nonprofit that provides information about abortion pills, including some half-dozen websites that sell the pills without a prescription. Plan C said it regularly orders from the websites to vet them.

The teacher said she bought pills from Aid Access, a telemedicine provider in Austria, before realizing she would have to wait as long as three weeks for the pills to arrive from India.

“We really understand that this wait can be hard for women, and it’s really unfortunate that it’s something we cannot change,” Aid Access founder Rebecca Gomperts said.

The teacher in Ohio said she consulted Plan C again and bought pills for \$470 from onlineabortionpillsrx.com. The site sent her a link to pay via PayPal, she said. The site instructed her not to mention the medications she was purchasing on PayPal, according to an email viewed by The Wall Street Journal.

“In case PayPal comes to know about what you purchased, PayPal may take legal action against you,” the email said.

Onlineabortionpillsrx.com, which is registered to a post-office box in Sydney, Australia, didn’t respond to requests for comment.

PayPal generally doesn’t pursue legal action against buyers, said a person familiar with the platform’s operations, but the company could close accounts if they violate its acceptable-use policy. The policy says sales of products requiring a prescription aren’t allowed without approval.

The teacher said she received a message from onlineabortionpillsrx.com saying the pills were delayed in transit from India. She said she paid \$350 via PayPal to a third site, genericabortionpills.com. She said the pills arrived in a couple of days postmarked from Denver in a box marked “Antipreg Kit,” which was viewed by the Journal.

Genericabortionpills.com didn’t respond to requests for comment. The website says it sells pills made by Zydus. Zydus manufactures abortion pills on a contract basis, a spokesman said.

“We have no information on how they are being sold online,” he said.

*—Jim Oberman contributed to this article.*

**Write to Dominique Mosbergen at [dominique.mosbergen@wsj.com](mailto:dominique.mosbergen@wsj.com) and Vibhuti Agarwal at [vibhuti.agarwal@wsj.com](mailto:vibhuti.agarwal@wsj.com)**



## **EXHIBIT 82**

### **Declaration of Dr. Ingrid Skop**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

**ALLIANCE FOR HIPPOCRATIC MEDICINE**, on behalf of itself, its members, and their members, and their members' patients; **AMERICAN ASSOCIATION OF PRO-LIFE OBSTETRICIANS AND GYNECOLOGISTS**, on behalf of itself, its members, and their patients; **AMERICAN COLLEGE OF PEDIATRICIANS**, on behalf of itself, its members, and their patients; **CHRISTIAN MEDICAL & DENTAL ASSOCIATIONS**, on behalf of itself, its members, and their patients; **SHAUN JESTER, D.O.**, on behalf of himself and his patients; **REGINA FROST-CLARK, M.D.**, on behalf of herself and her patients; **TYLER JOHNSON, D.O.**, on behalf of himself and his patients; and **GEORGE DELGADO, M.D.**, on behalf of himself and his patients,

Plaintiffs,

Case No. \_\_\_\_\_

v.

**U.S. FOOD AND DRUG ADMINISTRATION; ROBERT M. CALIFF, M.D.**, in his official capacity as Commissioner of Food and Drugs, U.S. Food and Drug Administration; **JANET WOODCOCK, M.D.**, in her official capacity as Principal Deputy Commissioner, U.S. Food and Drug Administration **PATRIZIA CAVAZZONI, M.D.**, in her official capacity as Director, Center for Drug Evaluation and Research, U.S. Food and Drug Administration; **U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES**; and **XAVIER BECERRA**, in his official capacity as Secretary, U.S. Department of Health and Human Services,

Defendants.

## DECLARATION OF DR. INGRID SKOP

I, Ingrid Skop, a citizen of the United States and a resident of San Antonio, Texas, declare under penalty of perjury under 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge.

1. I am over eighteen years old and make this declaration on personal knowledge.
2. I am a board-certified obstetrician and gynecologist working for OB Hospitalist Group with privileges in the Baptist Hospital System.
3. I also serve as a Senior Fellow and Director of Medical Affairs at the Charlotte Lozier Institute.
4. I am a member of Plaintiff American Association of Pro-Life Obstetricians and Gynecologists (AAPLOG), where I served as a member of the board from 2018-2020. I am also a member of the Christian Medical & Dental Associations.
5. I received my medical degree from Washington University School of Medicine in 1992 and completed my residency in obstetrics and gynecology at the University of Texas Health Sciences Center at San Antonio in 1996.
6. My current practice involves delivering babies and performing surgeries in a hospital setting as an obstetric hospitalist. In my prior 25-year career in a large single-specialty OB/GYN practice, I also provided clinic-based obstetric and gynecologic care to women and girls.

7. I have provided written and oral expert testimony about chemical abortion to several state legislatures and to the United States Congress.
8. I have also published the peer-reviewed articles “Chemical Abortion: Risks Posed by Changes in Supervision” and “Medical Abortion: What Physicians Need to Know” in the Journal of American Physicians and Surgeons.
9. The articles I published reflect the research I have performed on the risks associated with unsupervised chemical abortion—a practice that is becoming more common.
10. A chemical abortion includes providing patients with a combination of two drugs. One drug—mifepristone—blocks hormonal support, killing the unborn child, while the other—misoprostol—induces uterine contractions to expel the unborn child and the pregnancy tissue.
11. The drugs mifepristone and misoprostol may cause serious complications for the women and girls who take them.
12. In my practice, I often treat patients who are admitted through the hospital’s emergency department with complications from chemical abortions.
13. In my practice, I have cared for several dozen women in the emergency department who were totally unprepared for the pain and bleeding they experienced due to chemical abortion.
14. In my experience caring for women who have gone through chemical abortion, the doctors who prescribed or administered chemical abortion drugs

to these women often did not adequately prepare them for the drugs' effects, so these women could not have truly achieved informed consent.

15. At least a dozen patients have expressed significant emotional distress to me when they viewed the body of their unborn child in the toilet after the chemical abortion.

16. I have treated patients who have experienced trauma and emotional distress because of complications from chemical abortion. Those women were not anticipating that complications were possible and likely did not have sufficient informed consent to proceed with chemical abortion.

17. In my practice, I have cared for at least a dozen women who have required surgery to remove retained pregnancy tissue after a chemical abortion. Sometimes this includes the embryo or fetus, and sometimes it is placental tissue that has not been completely expelled.

18. I have cared for approximately five women who, after a chemical abortion, have required admission for a blood transfusion or intravenous antibiotics or both.

19. Complications from chemical abortion are not uncommon. In fact, chemical abortions involve more complications than surgical abortions.

20. The FDA's actions in 2016 and 2021 have increased the frequency of complications from chemical abortion.

21. Given my experience, I expect to see and treat more patients presenting with complications from chemical abortion.

22. For example, in one month while covering the emergency room, my group practice admitted three women to the hospital. Of the three women admitted in one month due to chemical abortion complications, one required admission to the intensive care unit for sepsis and intravenous antibiotics, one required a blood transfusion for hemorrhage, and one required surgical completion for the retained products of conception (*i.e.*, the doctors had to surgically finish the abortion with a suction aspiration procedure).

23. In my office, I treated one young woman who had been bleeding for six weeks after she took the chemical abortions drugs given to her by a doctor at a Planned Parenthood clinic. After two follow-ups at Planned Parenthood, during which she was given additional misoprostol but not offered surgical completion, she presented to me for help. I performed a sonogram, identified a significant amount of pregnancy tissue remaining in her uterus, and performed a suction aspiration procedure to resolve her complication.

24. I have also cared for minor women below the age of 18 who have obtained chemical abortion drugs. Although mifepristone has not been studied specifically in minor women, the FDA has negligently allowed their provision to this special age group, assuming their response will be the same as adult women.

25. The FDA's actions deregulating mifepristone and expanding access to unsupervised chemical abortion harm women and their doctors, including me. Concerns about "unsafe, back-alley abortions" were used to overturn all

state abortion restrictions in 1973 and they are being recycled today to allow the abortion industry to continue perpetuating dangerous abortion methods. Yet, a clear-eyed look at the FDA's actions allowing unsupervised "mail-order abortions" shows that they are now promoting illegal, unsafe "chemical coat hangers" to the women they falsely say they want to protect.

26. The FDA's actions harm women, including my patients, because without proper oversight, chemical abortions can become even more dangerous than when they are supervised.
27. The FDA's actions harm women, including my patients, because clinics and physicians prescribing or dispensing chemical abortion drugs, or websites that provide these drugs through mail order delivery without any physician involvement, often underprepare women for the severity and risks of chemical abortion, and they often provide insufficient or no follow-up care to those women. Many women are inadequately prepared for the effects of the drugs, the severity of the pain and bleeding they will experience, the human tissue they will expel, and some are unaware that they have complicating factors such as ectopic implantation, more advanced gestation than estimated, and Rh-negative blood type. These patients are being abandoned because in many cases there is no doctor-patient relationship, so they often present to overwhelmed emergency rooms in their distress, where they are usually cared for by physicians other than the abortion prescriber.

28. Unsupervised chemical abortion—authorized by the FDA—harms women because they may have underestimated the gestational age of their unborn child. Women who should not be a candidate for chemical abortion because they are past the FDA-approved cutoff of ten weeks gestation may consume chemical abortion drugs, which will increase their chances of complications due to the increased amount of tissue, leading to hemorrhage, infection and/or the need for surgeries or other emergency care.

29. For example, approximately 2% of pregnancies are ectopic pregnancies, implanted outside of the uterine cavity. Chemical abortion drugs will not effectually end an ectopic pregnancy because they exert their effects on the uterus, which leaves women at risk of severe harm from hemorrhage due to tubal rupture, in need of emergent surgery or potentially at risk of death. Failure to perform an ultrasound prior to prescribing abortion drugs will cause some women to remain undiagnosed and at high risk for these adverse outcomes.

30. The FDA's removal of the reporting requirement for adverse events of mifepristone harms women by creating an inaccurate safety profile, and it harms my practice because it makes it more difficult to practice evidence-based medicine. The incidence of abortion-related complications remains unknown if there is no accurate system for data collection.

31. The FDA's actions also harm women because the lack of oversight will likely exacerbate human trafficking, which happens frequently in San Antonio. In

my practice, part of my care of my patients is ensuring that they are making medical decisions free of coercion. Many trafficked women experience unintended pregnancies and alert doctors serve as an important resource to intervene on behalf of women. Removing the in-person medical interaction removes an opportunity to identify and rescue these women. It also leaves them at risk of being coerced into an abortion they may not desire.

32. Deregulated chemical abortion harms my practice because it increases the number of women who come to the emergency department with complications. When I must perform surgery to deal with complications from chemical abortions, this takes attention away from my other patients. As a hospitalist, I am often supervising multiple laboring patients on labor and delivery. When I am called to the operating room to address an emergency resulting from chemical abortion, this necessarily means I may not be immediately available if an emergency should occur with one of my laboring patients.

33. Unsupervised chemical abortion is heartbreaking to me because it causes women to suffer unnecessarily, and my patients deserve quality medical care.

34. The FDA's expansion of chemical abortion also harms my conscience rights because it could force me to have to surgically finish an incomplete elective chemical abortion. I object to abortion because it ends a human life. My moral and ethical obligation to my patients is to promote human life and health.

But the FDA's actions may force me to end the life of a human being in the womb for no medical reason.

Executed this November 11, 2022.

By: Ingrid Skop, MD  
Ingrid Skop, MD